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7

8 UNITED STATES BANKRUPTCY COURT

9 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

10 In re

11 NORTHERN HOLDING, LLC,

12 Debtor.  
13  
14

Case No. 8:20-bk-13014-ES

Chapter 7

FIRST INTERIM APPLICATION FOR  
ALLOWANCE OF FEES AND COSTS  
FILED BY MARSHACK HAYS LLP AS  
GENERAL COUNSEL FOR TRUSTEE;  
MEMORANDUM OF POINTS AND  
AUTHORITIES; DECLARATION OF  
TINHO MANG IN SUPPORT

16 Date: May 5 2022<sup>1</sup>

17 Time: 10:30 a.m..

18 Ctrm: 5A<sup>2</sup>

19 Location: United States Bankruptcy Court  
411 West Fourth Street  
Santa Ana, CA 92701-4593  
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27 <sup>1</sup> Hearing Date reserved.

28 <sup>2</sup> Notwithstanding the opening of the Courthouse to in-person proceedings, in light of the overwhelming support by the Bar for continued virtual appearances, Judge Smith will continue conducting hearings remotely using ZoomGov audio and video.

1 TO THE HONORABLE ERITHE A. SMITH, UNITED STATES BANKRUPTCY JUDGE, THE  
2 OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED PARTIES, ALL  
3 CREDITORS, AND/OR THEIR ATTORNEYS OF RECORD:

4 Marshack Hays LLP (“Firm”) respectfully submits this First Interim Application for  
5 Allowance of Fees and Costs (“Application”). The Firm represents Richard A. Marshack, the duly  
6 appointed and acting chapter 7 trustee (“Trustee”) for the bankruptcy estate (“Estate”) of Northern  
7 Holding, LLC (“Debtor”), as the Estate’s general counsel. By this Application, the Firm seeks  
8 allowance of \$266,530.00 in fees and \$6,915.79 for reimbursement of costs for a total award of  
9 \$273,445.79 pursuant to 11 U.S.C. §§330 and 331 that encompasses services rendered and expenses  
10 paid or incurred from June 15, 2021, through and including March 31, 2022 (“Reporting Period”).

11 **1. Summary of Argument**

12 Retained professionals can be awarded interim compensation where the fees are reasonable  
13 and necessary for the administration of the Estate. In this case, Trustee sold real property for \$9.1  
14 million after hundreds of hours of work by himself (as trustee), his attorneys, and his real estate  
15 agents. Trustee has separately filed a motion seeking authorization to distribute funds held pending  
16 further order of the Court according to a partial subordination agreement between the Estate and  
17 Farm Credit West, FCLA (“FCW”), the secured creditor against substantially all property of the  
18 Estate. Based on Trustee’s efforts, FCW was paid around \$8.3 million out of escrow, and the sale of  
19 the property to Riboli Paso Robles, LLC (“Buyer”) was made possible through the efforts of  
20 Trustee’s professionals including the Firm. Through this application, the Firm seeks allowance of its  
21 accrued fees and costs on an interim basis, and for authorization from Trustee to pay such allowed  
22 interim fees and costs as unencumbered or specifically designated funds become available.

23 **2. Procedural Background – LBR 2016-1(A)(1)(A)**

24 **A. Prepetition Matters**

25 Erich Russell was the former owner and operator of Rabbit Ridge Winery (“Rabbit Ridge”),  
26 which was as of October 2020 located at 1172 San Marcos Road, Paso Robles, CA (“San Marcos  
27 Property”). In addition to the San Marcos Property, Mr. Russell owned property commonly known  
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1 as 2380 Live Oak Road, Paso Robles, CA (“Live Oak Property”), and certain land adjacent to the  
2 San Marcos Property commonly known as the “Texas Road Property” (collectively, the  
3 “Properties”). To finance his business operations, Mr. Russell borrowed substantial sums of money  
4 from Farm Credit West, FLCA (“FCW”), which loans were secured certain assets including  
5 substantially all assets of Rabbit Ridge and the Properties.

6 On March 23, 2007, as document no. 2007-19418 in the County of San Luis Obispo, FCW  
7 recorded a deed of trust in the principal amount of \$17,500,000 against various properties owned by  
8 Erich Russell, including the San Marcos Property, adjacent farmland commonly known as the Texas  
9 Road Property, and residential real property located at 2380 Live Oak Road, Paso Robles, CA (“Live  
10 Oak Property”).

11 Prior to a foreclosure of the Properties by FCW, Mr. Russell filed an individual Chapter 11  
12 case, initiating bankruptcy case number 9:20-bk-10035-DS (“Individual Case”). On June 19, 2020,  
13 the Individual Case was dismissed for cause.

14 A subsequent foreclosure sale for the Properties was scheduled by FCW for October 29,  
15 2020. Prior to the foreclosure date, Mr. Russell and FCW continued to discuss a possible forbearance  
16 and an extension of the foreclosure date.

17 On or about October 28, 2020, Mr. Russell signed quitclaim deeds transferring the Properties  
18 to Debtor. These quitclaim deeds were recorded on the same date. Additionally, ownership and  
19 control of Rabbit Ridge passed to LeRoy Codding (“Mr. Codding”).

## 20 **B. The Bankruptcy Proceedings**

21 On October 28, 2020 (“Petition Date”), Northern Holding, LLC, a Minnesota limited liability  
22 company (“Debtor”) filed a voluntary petition under Chapter 11 of Title 11 of the United States  
23 Code. Debtor’s managing member was Mr. Codding.

24 On October 29, 2020, as Dk. No. 5, FCW filed a notice of continuation of perfection of  
25 security interest and demand to sequester cash collateral.

1 On November 6, 2020, as Dk. No. 11, FCW filed a motion for relief from the automatic stay  
2 regarding Live Oak Property and Debtor's other two properties. In short, FCW has a blanket lien in  
3 the approximate amount of \$19-20 million over all assets of Debtor.

4 On March 18, 2021, a proof of claim was filed on behalf of the County of San Luis Obispo  
5 related to unpaid property taxes. Although the total amount of the filed secured claim was  
6 \$3,056,482.21, Trustee understands that the vast majority of the claimed property tax obligation is  
7 on account of the San Marcos Property, and any outstanding property taxes on the Live Oak  
8 Property are relatively minimal.

9 On June 15, 2021, the case was converted to Chapter 7. Richard A. Marshack was appointed  
10 as the Chapter 7 trustee. Immediately upon Trustee's appointment, he conducted an investigation of  
11 the Estate's assets both personally and through his professionals.

12 On July 16, 2021, as Dk. No. 138, the Trustee filed a motion to extend time to assume or  
13 reject executory contracts pursuant to 11 U.S.C. 365(a) ("Extend Motion"). On August 9, 2021, a  
14 hearing was held on the Extend Motion, and on August 10, 2021, as Dk. No. 188, the Court entered  
15 an order granting the Extend Motion.

16 On July 28, 2021, as Dk. No. 159, Trustee filed a notice of assets. The Court set a claims bar  
17 date of November 1, 2021 ("Bar Date"). By the Bar Date, only eight proofs of claim had been filed,  
18 and only one proof of claim was filed as a partial general unsecured claim – the claim by the  
19 Franchise Tax Board in the amount of \$10,297.92 (priority claim: \$3,529.47). Thus, the vast  
20 majority of the nearly \$30 million in claims are comprised of secured and administrative or priority  
21 unsecured claims.

22 On August 26, 2021, as Dk. No. 201, Trustee and FCW filed a stipulation providing for  
23 certain terms for relief from the automatic stay.

24 On September 7, 2021, as Dk. No. 210, the Court entered an order granting relief from stay  
25 to FCW pursuant to the stipulated terms agreed to by Trustee and FCW. Importantly, the stipulated  
26 terms provided that no enforcement action would be taken against the Live Oak Property before  
27 December 1, 2021 ("Enforcement Date"). Thus, Trustee had a short timeline under which he would  
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1 be allowed to continue marketing the Live Oak Property (and other Estate properties) to sell.

2 **i. Employment Applications**

3 On July 15, 2021, as Dk. No. 136, Trustee filed an application to employ Marshack Hays  
4 LLP as Trustee's general counsel ("MH Employment Application"). On August 11, 2021, as Dk.  
5 No. 190, the Court entered an order approving the MH Employment Application.

6 On July 16, 2021, as Dk. No. 140, Trustee filed an application to employ Onyx Asset  
7 Advisors, LLC ("Onyx") jointly with Hilco Real Estate, LLC ("Hilco") on modified employment  
8 terms to market and sell the Properties on behalf of the Estate ("Broker Employment Application").  
9 On September 7, 2021, as Dk. No. 209, the Court entered an order approving the Broker  
10 Employment Application.

11 On August 6, 2021, as Dk. No. 177, the Trustee filed an application to employ Bicher &  
12 Associates as the Estate's Field Agent ("Bicher Employment Application"). On October 4, 2021, as  
13 Dk. No. 266, the Court entered an order approving the Bicher Employment Application.

14 **ii. Turnover Motion**

15 Upon conversion, property of the Estate principally included the Properties, which combined,  
16 consist of over 470 acres of vineyards, a 7,500 square-foot residence, and 45,000 square foot wine  
17 production facility in Paso Robles, CA. The Properties were occupied by Rabbit Ridge Winery and  
18 the family of Erich Russell, who allegedly had leases with Debtor that were entered into the day  
19 prior to the Petition Date, refused to turn over possession and vacate, and failed to pay post-petition  
20 rent and failed to pay the post-petition monthly insurance premiums.

21 On August 2, 2021, as Dk. No. 162, the Trustee filed a motion for order compelling turnover  
22 of estate property pursuant to 11 U.S.C. §542(a) and for determination that eviction moratorium do  
23 not apply to turnover of bankruptcy estate property ("Turnover Motion"). A hearing on the Turnover  
24 Motion was held on August 30, 2021.

25 On August 9, 2021, as Dk. No. 184, Trustee filed a stipulation for turnover of the Properties  
26 with Rabbit Ridge Wine Sales, Inc. ("Rabbit Ridge"), and Mr. Coddington signed on behalf of Rabbit  
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1 Ridge. On August 23, 2021, as Dk. No. 196, the Court approved the turnover stipulation with Rabbit  
2 Ridge.

3 On August 31, 2021, as Dk. No. 207, Trustee filed a stipulation for turnover of the  
4 Properties which was signed by Erich Russell and Joanne Russell (“Russell Stipulation”).

5 On September 13, 2021, as Dk. No. 218, the Court entered an order granting the Turnover  
6 Motion as to Sarah Garrett and Brice Garrett and approving the Russell Stipulation.

7 After entry of the turnover orders, the Russells and Garretts voluntarily vacated the  
8 Properties.

### 9 **iii. Farm Operator Agreement & Drilling Motion**

10 On August 9, 2021, as Dk. No. 186, Trustee filed a motion to approve a farm operator  
11 agreement and to authorize operations at the Properties for the limited purpose and scope of  
12 completing the Fall 2021 harvest with the assistance of a farm operator (“Operate Motion”). Mr.  
13 Codding was the designated farm operator.

14 The Operate Motion acknowledged that all grapes and crop on the Properties constituted  
15 FCW’s collateral and any proceeds derived therefrom likely also constituted FCW’s cash collateral.  
16 After the filing of the Operate Motion, the Firm assisted the Trustee to negotiate with FCW for the  
17 use and distribution of its cash collateral, culminating in a stipulation between FCW and Trustee  
18 which was signed minutes before the hearing on the Operate Motion and the terms were verbally  
19 read into the record and incorporated into the Court’s order.

20 On September 7, 2021, as Dk. No. 211, the Court entered an order approving the Operate  
21 Motion (“Operate Order”). The harvest has now concluded and the period for the Operate Order has  
22 expired. Trustee has collected around \$243,000 in proceeds and is in the process of determining the  
23 extent of reimbursements allowable to Mr. Codding, with the consent of FCW.

24 Unfortunately, Trustee later discovered that Mr. Codding had unlawfully diverted no less  
25 than \$140,000 from the Estate and had sold tens of tons of grapes without the knowledge and  
26 consent of Trustee. After attempts to negotiate and determine the accounting of the diversion broke  
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1 down between the Estate and Mr. Coddington, Trustee started receiving threats and attempts at  
2 intimidation from Mr. Coddington.

3 On April 1, 2022, as Dk. No. 304, Trustee filed a motion for issuance of an order to show  
4 cause re: civil contempt against Mr. Coddington and his related entities ("Contempt Motion"). Trustee  
5 understands Mr. Coddington intends to oppose the Contempt Motion. Until the Contempt Motion is  
6 resolved and the issue of Mr. Coddington's allowed reimbursements is determined, FCW and the Estate  
7 may not be able to receive their portion of the proceeds of grape sales.

#### 8 **iv. Bid Procedure Motion and Due Diligence**

9 On September 28, 2021, Trustee and Riboli Paso Robles, LLC ("Buyer") executed a  
10 purchase and sale agreement ("PSA") for those specified assets listed and described in Article I of  
11 the PSA (which includes, essentially, the Live Oak Property). Under the PSA, Buyer would  
12 continue conducting its due diligence which includes drilling exploratory water wells to determine  
13 the level of water at the Live Oak Property for future agricultural use.

14 On October 4, 2021, as Dk. No. 227, Trustee filed a motion for order authorizing water well  
15 drilling on property to acquire water data ("Drilling Motion").

16 On October 5, 2021, as Dk. No. 232, Trustee filed a Motion for Order Approving Overbid  
17 Procedures for the sale of the Live Oak Property ("Bid Procedure Motion").

18 On October 20, 2021, as Dk. No. 238, the Court entered an order granting the Bid Procedure  
19 Motion ("Bid Procedure Order").

20 On November 1, 2021, as Dk. No. 242, the Court entered an order granting the Drilling  
21 Motion ("Drilling Order").

22 After entry of the Bid Procedure Order and Drilling Order, Buyer proceeded to conduct its  
23 due diligence and Trustee negotiated for the continued forbearance of FCW to delay foreclosure of  
24 the Properties and ensure that the Live Oak Property could be sold.

#### 25 **v. Compromise Motion with FCW**

26 Upon Trustee's appointment after conversion of the case to Chapter 7, Trustee drafted and  
27 began negotiating with FCW for the partial voluntary subordination of its secured claim so that costs  
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1 of sale and unsecured creditors might be paid from otherwise overencumbered property. It took  
2 months of negotiations before FCW warmed to the concept of allowing the Estate to sell any  
3 property and Trustee extensively negotiated the deal points with FCW for the partial subordination  
4 of its secured claim and to assert the Estate's rights to surcharge under 11 U.S.C. § 506(c). After  
5 months of negotiations, FCW signed off on terms for the voluntary partial subordination of its  
6 secured claim as to the sale proceeds of the Properties, in certain specified amounts.

7 On December 20, 2021, as Dk. No. 264, Trustee filed a motion to approve settlement and  
8 partial subordination agreement with FCW, where FCW consented to certain terms for the sale of the  
9 Live Oak Property ("Compromise Motion"). Included in the stipulation for partial subordination was  
10 an extension of the Enforcement Date to January 28, 2022, with an automatic extension if a sale  
11 motion was filed by such date, to March 15, 2022.

12 On January 14, 2022, as Dk. No. 276, the Court entered an order granting the Compromise  
13 Motion. With the Estate to receive a sure benefit from the sale of the Live Oak Property (and the  
14 other Properties), Trustee's services along with the Firm's services provided a definite and  
15 quantifiable benefit to Estate creditors.

16 **vi. Sale Motion**

17 On January 19, 2022, as Dk. No. 278, the Trustee filed a motion for an order authorizing sale  
18 of Live Oak Property ("Sale Motion"). The hearing on the Sale Motion was set for February 9, 2022,  
19 the last day that the presiding judge in the case, the Hon. Mark S. Wallace, was conducting hearings  
20 on the bench.

21 At the hearing on the Sale Motion, no overbidders appeared and the sale was approved with  
22 certain remaining contingencies. After the hearing, Trustee and his professionals continued to  
23 negotiate with Buyer and FCW, and Buyer finally completed its due diligence. As a result, the  
24 parties were able to agree on the final form of an order approving the sale, after extensive post-  
25 hearing negotiations.

26 On March 4, 2022, as Dk. No. 292, the Court entered an order approving the Sale Motion.

27 On March 15, 2022, the sale of the Live Oak Property closed and escrow made distributions,  
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1 including over \$8.3 million to FCW.

2 **3. Status of Administration– LBR 2016-1(a)(1)(A)(ii)**

3 Pursuant to LBR 2016-1(a)(1)(A)(ii), “applicant must report the status of administration of  
4 the estate, discussing the actions taken to liquidate property of the estate, the property remaining to  
5 be administered, the reasons the estate is not in a position to be closed, and whether it is feasible to  
6 pay an interim dividend to creditors.”

7 Administration of this case is ongoing. After the sale of the Live Oak Property, FCW has  
8 been considering whether to foreclose on the remaining two Properties. Prior to a foreclosure,  
9 Trustee has continued to market the San Marcos Property and Texas Road Property and has  
10 presented offers to FCW for its consent to sale. Most recently, there was a combined offer on the San  
11 Marcos Property and Texas Road Property that Trustee considers a very serious offer which has  
12 been sent to FCW for its consideration and consent. Additionally, the litigation over Mr. Codding’s  
13 diversion of funds from the Estate is ongoing and the disposition of \$243,000 in grape proceeds (not  
14 counting the diverted funds) has yet to be determined. Nonetheless, approval of interim fees is  
15 appropriate at this point because the Live Oak Property has been sold with certain specified amounts  
16 made available to pay administrative creditors (including attorneys’ fees), and if such funds are not  
17 disbursed from the specified amounts, the Estate will be unnecessarily depleted by ordinary-course  
18 banking fees (approximately 1-2% of total funds, pro-rated monthly).

19 **A. Funds on Hand in the Estate – LBR 2016-1(a)(1)(A)(iii)**

20 Pursuant to LBR 2016-1(a)(1)(A)(iii), “applicant must disclose the amount of money on  
21 hand in the estate and the estimated amount of other accrued expenses of administration.”

22 As of the filing of this Application, the Estate has \$740,138.85 on hand. Of these funds,  
23 \$310,750 is specifically reserved for payment of Trustee’s reduced (2.25%) compensation on the  
24 sale of the Live Oak Property at \$9.1 million, and \$106,000 is specifically reserved for payment of  
25 attorneys’ fees for the Firm. By a separate motion, Trustee seeks authorization to disburse this  
26 \$310,750 to the specified professionals.

1           **B.      Employment of the Firm – LBR 2016-1(a)(1)(B)**

2           Pursuant to LBR 2016-1(a)(1)(B), the Application must include “the date of entry of the  
3 order approving the employment of the individual or firm for whom payment of fees or expenses is  
4 sought, and the date of the last fee application for the professional.”

5           On July 15, 2021, as Dk. No. 136, Trustee filed an application to employ Marshack  
6 Hays LLP as general counsel (“Employment Application”). On August 11, 2021, as Dk. No. 190, the  
7 Court entered an order granting the Employment Application (“Employment Order”). A true and  
8 correct copy of the Employment Order is attached to the Declaration of Tinho Mang (“Mang  
9 Declaration”) as **Exhibit 1**.

10           **C.      Previous Fees and Expenses – LBR 2016-1(a)(1)(C)**

11           Pursuant to LBR 2016-1(a)(1)(C), the Application must include “a listing of the amount of  
12 fees and expenses previously requested, those approved by the court, and how much has been  
13 received.” The Firm has not previously filed an application for allowance of fees and costs.

14           **D.      Description of Services Rendered – LBR 2016-1(a)(1)(d)**

15           Pursuant to LBR 2016-1(a)(1)(C), the Application must include “a brief narrative statement  
16 of the services rendered and the time expended during the period covered by the application.”

17           The Reporting Period is June 15, 2021, through and including March 31, 2022. During this  
18 approximate nine month period, the Firm provided 637.30 hours of services to the Estate. The Firm’s  
19 blended hourly rate for all services provided to the Estate as set forth in this Application is \$418.  
20 Descriptions of the types of services rendered by the Firm are set forth below pursuant to the  
21 categories recommended by the Office of the United States Trustee.

22                   **i.      Asset Analysis and Recovery**

23           The Firm spent 111.70 hours on Asset Analysis and Recovery, resulting in fees of \$45,552,  
24 which is 17% of the total fees sought by the Application. The blended hourly rate for these services  
25 is approximately \$408. Services performed in this category are detailed in **Exhibit 2** attached to the  
26 Mang Declaration.

27           Services in this category include assisting the real estate agents in marketing for the  
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1 Properties, seeking turnover of the Properties, and detailed analysis of the value of the Properties and  
2 how to liquidate the Properties for the benefit of the Estate. Because the Properties were relatively  
3 large commercial properties with ongoing farming and winemaking operations when the cases were  
4 converted, the Firm expended significant resources in ensuring that the Properties were sufficiently  
5 analyzed and were brought into the control of the Trustee.

6 **ii. Litigation**

7 The Firm spent 112.80 hours on Litigation, resulting in fees of \$41,930, which is 16% of the  
8 total fees sought by the Application. The blended hourly rate for these services is approximately  
9 \$372. Services performed in this category are detailed in **Exhibit 2** attached to the Mang  
10 Declaration.

11 Services in this category include litigation and negotiations with FCW (regarding the  
12 subordination of its secured claim and other contested settlement discussions), Mr. Coddington  
13 (regarding his contempt), the Russells, and various entities under Mr. Coddington's control. No  
14 adversary complaints were filed in this case, although there are various competing claims to the  
15 remaining assets of the Estate which may necessitate adversarial litigation.

16 **iii. Meeting of Creditors**

17 The Firm spent 18 hours on Meeting of Creditors, resulting in fees of \$6,597, which is 2% of  
18 the total fees sought by the Application. The blended hourly rate for these services is approximately  
19 \$313. Services performed in this category are detailed in **Exhibit 2** attached to the Mang  
20 Declaration.

21 Services in this category include attendance and examination at two meetings of creditors,  
22 which were the initial meeting of creditors and the ultimate conclusion of the meeting of creditors.  
23 At both meetings of creditors, Mr. Coddington appeared and testified in his capacity as the managing  
24 member of the Debtor.

25 **iv. Relief from Stay Proceedings**

26 The Firm spent 20.60 hours on Relief from Stay Proceedings, resulting in fees of \$6,444,  
27 which is 2% of the total fees sought by the Application. The blended hourly rate for these services is  
28

1 approximately \$313. Services performed in this category are detailed in **Exhibit 2** attached to the  
2 Mang Declaration.

3 Services in this category include analyzing and responding to three different motions for  
4 relief from the automatic stay filed by FCW, Adler Belmont Group, Inc. (an insurance broker), and  
5 BankDirect. The stay relief motion filed by FCW was resolved by stipulation (some of this time  
6 overlaps with the “litigation” category) and the stay relief motion filed by Adler Belmont Group was  
7 opposed, with the Court denying that motion based on Trustee’s opposition. The stay relief motion  
8 filed by BankDirect was granted over Trustee’s opposition, with an allowed period for Trustee to  
9 obtain substitute insurance (because BankDirect sought relief from stay to cancel the Estate’s  
10 insurance policies). Although BankDirect ultimately obtained relief from stay and cancelled the  
11 policies covering Estate property, the time period to obtain substitute insurance was crucial to ensure  
12 that the Estate remained with adequate insurance coverage – and insurance was procured in this time  
13 period.

14 **v. Asset Disposition**

15 The Firm spent 268.50 hours on Asset Disposition, resulting in fees of \$128,335, which is  
16 48% of the total fees sought by the Application. The blended hourly rate for these services is  
17 approximately \$478. Services performed in this category are detailed in **Exhibit 2** attached to the  
18 Mang Declaration.

19 Services in this category include extensive efforts to assist with the sale of the Properties.  
20 Most of the time spent in this category relates to negotiations related to the sale of the Live Oak  
21 Property, which was a complicated transaction necessitating a detailed purchase and sale agreement,  
22 the resolution of various title issues, extensive due diligence by the Buyer, and a last-minute  
23 discovery regarding a lot line issue after Buyer’s surveyor submitted a surveying report. The Firm’s  
24 fees in this category by themselves exceed the \$100,000 reserve provided in the partial subordination  
25 approved by FCW.

26 **vi. Case Administration**

27 The Firm spent 12.70 hours on Case Administration, resulting in fees of \$3,519, which is 1%  
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1 of the total fees sought by the Application. The blended hourly rate for these services is  
2 approximately \$277. Services performed in this category are detailed in **Exhibit 2** attached to the  
3 Mang Declaration.

4 Services in this category include principally communications by the Firm either to the  
5 Trustee or on behalf of the Trustee with the Office of the United States Trustee and other compliance  
6 issues.

7 **vii. Claims Administration and Objections**

8 The Firm spent 6.30 hours on Claims Administration and Objections, resulting in fees of  
9 \$1,972, which is 1% of the total fees sought by the Application. The blended hourly rate for these  
10 services is approximately \$313. Services performed in this category are detailed in **Exhibit 2**  
11 attached to the Mang Declaration.

12 Services in this category include the preparation and filing of a motion to set an  
13 administrative claims bar date for Chapter 11 administrative claims and an analysis of some potential  
14 administrative claims. A more detailed analysis of the filed claims will be conducted by either the  
15 Trustee or the Firm when the remaining assets of the Estate are liquidated. Only a relatively minimal  
16 number of claims was filed prior to the claims bar date, and as discussed above, the vast majority of  
17 the filed claims in this case are alleged secured claims.

18 **viii. Fee/Employment Applications**

19 The Firm spent 17.30 hours on Employment and Fee Applications, resulting in fees of  
20 \$5,600, which is 2% of the total fees sought by the Application. The blended hourly rate for these  
21 services is approximately \$324. Services performed in this category are detailed in **Exhibit 2**  
22 attached to the Mang Declaration.

23 In this category, the Firm prepared its own employment application, the employment  
24 application for brokers to sell the Property and the employment of Estate's field agent. Additionally,  
25 the Firm prepared this first interim fee application. The time expended in this category is  
26 compensable pursuant to *Ferrette & Slatter v. United States Trustee (In re Garcia)*, 335 B.R. 717  
27 (B.A.P. 9th Cir. 2005).

1                    **ix.      Fee/Employment Objections**

2            The Firm spent 3.90 hours on Employment and Fee Objections, resulting in fees of \$1,311,  
3 which is less than 1% of the total fees sought by the Application. The blended hourly rate for these  
4 services is approximately \$336. Services performed in this category are detailed in **Exhibit 2**  
5 attached to the Mang Declaration.

6            Services in this category relate solely to the investigation of a potential objection to the  
7 allowance of compensation to former Chapter 11 counsel for the Debtor and subsequent negotiations  
8 to preserve the Estate's rights. No objections were received to the Firm's employment or fees to  
9 date.

10                   **x.        Business Operations**

11           The Firm spent 51.30 hours on Business Operations, resulting in fees of \$17,980, which is  
12 7% of the total fees sought by the Application. The blended hourly rate for these services is  
13 approximately \$350. Services performed in this category are detailed in **Exhibit 2** attached to the  
14 Mang Declaration.

15           Services in this category relate to seeking authorization from the Court to operate Debtor's  
16 business to complete the harvest, and efforts by the Firm to analyze, catalogue, monitor, and collect  
17 the receivables from the sale of grapes from operations. There is a slight overlap in this section with  
18 the investigation of claims regarding the mismanagement of the farm operations, including the theft  
19 of funds by Mr. Coddington.

20                   **xi.      SLO Property Tax Negotiations**

21           The Firm spent 14.20 hours on SLO Property Tax Negotiations, resulting in fees of \$7,290,  
22 which is 3% of the total fees sought by the Application. The blended hourly rate for these services is  
23 approximately \$513. Services performed in this category are detailed in **Exhibit 2** attached to the  
24 Mang Declaration.

25           A separate category was created for services relating to the specified tasks performed by the  
26 Firm to investigate and negotiate with the County of San Luis Obispo regarding its tax claim in  
27 excess of \$3 million accruing on the San Marcos Property. Pursuant to the stipulation filed on  
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January 31, 2022, as Docket No. 284, FCW agreed to a further partial subordination of its secured claim as to \$6,000 for the Firm to conduct an investigation and preliminary negotiation with the tax authority. The fees expended by the Firm in this section exceed the agreed amount, and the entire \$6,000 should be authorized as disbursements to the Firm in connection with this interim fee application and the concurrent motion for cash disbursements.

**E. Detailed Statement of Services Performed – LBR 2016-1(a)(1)(E)**

Pursuant to LBR 2016-1(a)(1)(E), “the application must contain a detailed listing of all time spent by the professional on matters for which compensation is sought” including date service was rendered, detailed description of service, amount of time spent, and identification of person who rendered service.

Attached to the Mang Declaration as **Exhibit 2** is a copy of the Firm’s computer billing printout of all of the Firm’s time records for this case, as kept in the ordinary course of business during the Reporting Period. The detail set forth in **Exhibit 2** enumerates the services performed by the Firm during the period covered by this Application.<sup>3</sup> Attached to the Mang Declaration as **Exhibit 3** is a summary schedule of the fees requested, as recommended in the U.S. Trustee Guidelines.

The persons who rendered services in connection with the Firm’s representation of the Estate are identified in the billing detail by their initials. Those persons are:

DEH	D. Edward Hays
CVH	Chad V. Haes
DAW	David A. Wood
KAT	Kristine A. Thagard
TM	Tinho Mang
PK	Pam Kraus
CM	Chanel Mendoza
LB	Layla Buchanan
CB	Cynthia Bastida

<sup>3</sup> A small number of billing entries have been redacted from the publicly-filed copy of this application due to the sensitive attorney-client privileged nature of the entries. An unredacted copy of such pages will be provided in the judge’s copy and will be made available to the United States Trustee.

1 There have been intra-office conferences billed by attorneys and paralegals. The Firm  
2 believes that, at times, intra-office conferencing is a necessary part of its ability to efficiently and  
3 effectively represent a bankruptcy estate by assembling a “team” of lawyers to work on the case.  
4 This team consists primarily of a supervising partner, one or more associate attorneys, and one or  
5 more paralegals. As a part of this team approach to representing the Trustee, the supervising partner  
6 analyzes the needs of the client and assigns to the associates or paralegal tasks based upon the level  
7 of expertise and experience needed to complete the task. A key to the team concept is  
8 communication among the members of the team. While it may not be necessary for all team  
9 members to be aware of all of the intricacies of the case, the supervising partner must be informed of  
10 all aspects of the case. Moreover, from time to time, it is essential for the partner supervising the  
11 case to provide to junior members of the team advice on matters which arise in the course of the  
12 representation of the Trustee.

13 **F. Detailed Statement of Costs Incurred – LBR 2016-1(a)(1)(F)**

14 Pursuant to LBR 2016-1(a)(1)(F), “an application that seeks reimbursement of actual and  
15 necessary expenses must include a summary listing of all expenses by category (*i.e.*, long distance  
16 telephone, photocopy costs, facsimile charges, travel, messenger and computer research). As to each  
17 unusual or costly expense item, the application must state: (i) the date the expense was incurred; (ii) a  
18 description of the expense; (iii) the amount of the expense; and (iv) an explanation of the expense.”

19 Attached to the Mang Declaration as **Exhibit 4** is a schedule of costs and expenses incurred  
20 or paid by the Firm during the relevant time period but not yet reimbursed. Attached to the Mang  
21 Declaration as **Exhibit 5** is a summary schedule of costs, as recommended in the U.S. Trustee  
22 Guidelines. The Firm believes and represents that the costs and expenses are reasonable under the  
23 circumstances of this case and the various pleadings filed by the Firm on behalf of the Trustee.

24 During the Reporting Period, the Firm incurred expenses of \$6,915.79. These expenses were  
25 actual expenses incurred in connection with the services rendered on behalf of the Estate. Expenses  
26 of this type are billed to and paid by the Firm’s clients who pay monthly without contingency as to  
27  
28



payment. The Firm has not included such expenses in its overhead and such expenses are not encompassed by its billing rates.

### **G. Hourly Rates – LBR 2016-1(a)(1)(G)**

Pursuant to LBR 2016-1(a)(1)(G), “unless employment has been approved on a fixed fee, percentage fee, or contingent fee basis, the application must contain a listing of the hourly rates charged by each person whose services form a basis for the fees requested in the application. The application must contain a summary indicating for each attorney by name: (i) The hourly rate and the periods each rate was in effect; (ii) The total hours in the application for which compensation is sought; and (iii) The total fee requested in the application.”

<u>Timekeeper</u>	<u>Rate/Period</u>	<u>Total Hours</u>	<u>Total Fees</u>
D. Edward Hays	06/14/21 to		
	03/31/22		
	\$650	9.4	6,110.00
Chad V. Haes	06/14/21 to		
	03/31/22		
	\$490	0.2	98.00
David A. Wood	06/14/21 to		
	03/31/22		
	\$490	67.7	33,173.00
Kristine A. Thagard	06/14/21 to		
	03/31/22		
	\$550	217.7	119,735.00
Tinho Mang	06/14/21 to		
	03/31/22		
	\$350	266.0	93,100.00
Pamela Kraus	06/14/21 to		
	03/31/22		
	\$280	0.7	196.00
Chanel Mendoza	06/14/21 to		
	03/31/22		
	\$260	6.7	1,742.00
	NC	0.0	0.00

Layla Buchanan	06/14/21 to 03/31/22		
	\$260	47.0	12,220.00
	NC	1.4	0.00
Cynthia Bastida	06/14/21 to 03/31/22		
	\$260	0.6	156.00
	NC	0.0	0.00
<b>Totals:</b>		<b><u>637.3</u></b>	<b><u>266,530.00</u></b>

## **H. Professional Education and Experience – LBR 2016-1(a)(1)(H)**

Pursuant to LBR 2016-1(a)(1)(H), the Application must include “a description of the professional education and experience of each of the individuals rendering services, including identification of the professional school attended, year of graduation, year admitted to practice, publications or other achievements, and explanation of any specialized background or expertise in bankruptcy-related matters.”

A brief biographical description of the professionals who rendered services for which compensation is sought by this Application (including those members of the Firm who rendered services but are no longer employed by the Firm) is attached to the Mang Declaration as **Exhibit 6**. The Firm believes and represents that the services rendered during the Reporting Period have been beneficial to the estate and that this request for allowance of compensation is fair and reasonable.

## **I. Change in Professional Rates – LBR 2016-1(a)(1)(I)**

Pursuant to LBR 2016-1(a)(1)(I), “if the hourly rate has changed during the period covered by the application, the application must specify the rate that applies to the particular hours for which compensation is sought.” The hourly rates of the Firm’s professionals did change during the Reporting Period, and the rates that apply to the particular hours for which compensation is sought are set forth both in the chart above at Section G. The Firm did not charge for providing notice of changed hourly rates.

## **J. Client Declaration – LBR 2016-1(a)(1)(J)**

Pursuant to LBR 2016-1(a)(1)(J), the Application must include “a separately filed declaration

1 from the client indicating that the client has reviewed the fee application and has no objection to it.”

2 Trustee will review the employment application and file a declaration in advance of the  
3 hearing on this fee application with his comments and objections, if any.

## 4 **2. Legal Argument**

5 “A trustee, an examiner, a debtor’s attorney, or any professional person employed  
6 under section 327 or 1103 of this title may apply to the court not more than once every 120 days  
7 after an order for relief in a case under this title, or more often if the court permits, for such  
8 compensation for services rendered before the date of such an application or reimbursement for  
9 expenses incurred before such date as is provided under section 330 of this title. After notice and a  
10 hearing, the court may allow and disburse to such applicant such compensation or reimbursement.”  
11 11 U.S.C. § 331.

### 12 **A. Interim approval of fees is appropriate in this circumstance.**

13 “[P]rofessionals should not have to finance a reorganization by waiting years for  
14 approval of their fees.” *In re Stewart*, 157 B.R. 893, 897 (B.A.P. 9th Cir. 1993). “[W]hen counsel  
15 must wait an extended period for payment, counsel is essentially compelled to finance the  
16 reorganization... a result that is clearly contrary to Congressional intent.” *In re Knudsen Corp.*, 84  
17 B.R. 668, 672 (B.A.P. 9th Cir. 1988). “The appropriateness of the allowance and payment of fees on  
18 an interim basis in any particular case will depend on several factors:

- 19 1. The current availability of funds from which fees can be disbursed;
- 20 2. The existence and amount of other accrued administrated obligations of the same or  
21 higher priority that might exhaust available funds;
- 22 3. The continuing need for funds to pay the necessary administrative expenses likely to  
23 be incurred in completing administration of the case; and
- 24 4. Inability to file a final fee application in the near future.”

25 *In re Commercial Consortium of California*, 135 B.R. 120, 124-25 (Bankr. C.D. Cal. 1991) (quoted  
26 by COLLIER ON BANKRUPTCY ¶ 331.06[1][a] (16th ed. 2019)). “Although the award and payment of  
27 interim compensation should be permitted in chapter 7 cases, courts ought to give special scrutiny to  
28

1 those interim compensation applications.” COLLIER ON BANKRUPTCY ¶ 331.06[1][a] (16th ed. 2019).  
2 Interim fee awards are subject to final approval. *Leichty v. Neary (In re Strand)*, 375 F.3d 854, 858  
3 (9th Cir. 2004).

4 In this case, the Firm provided on average approximately 60 hours per month assisting with  
5 the administration of this case, and has accrued a significant unpaid bill. Given the limited consent  
6 from FCW to partially subordinate its secured claim, the Firm only requests limited authorization to  
7 pay a portion of its allowed fees and costs at this time. Specifically, as set forth in the motion for  
8 cash disbursements, all four factors for allowance and payment of limited administrative expenses  
9 from those specified amounts set forth in the Court-approved partial subordination agreement are  
10 satisfied. Specifically with respect to this fee application, the Firm seeks allowance of all accrued  
11 fees and costs, and interim payment only in the amount of \$106,000, representing its administrative  
12 reserves from the sale of the Live Oak Property. While the Firm may be entitled to interim  
13 distributions from the professional services relating to the grape crops for 2021, these fees will be  
14 requested in a subsequent motion after FCW reviews and consents to such use of its cash collateral.

15 **B. The Firm’s fees are reasonable and should be approved on an**  
16 **interim basis.**

17 The Bankruptcy Code provides that the Court can authorize payment of reasonable and  
18 necessary compensation and reimbursement of expenses.

19 (a) (1) After notice to the parties in interest and the United States  
20 Trustee and a hearing, and subject to sections 326, 328, and 329, the  
21 court may award to a trustee, an examiner, a professional person  
22 employed under section 327 or 1103- (A) reasonable compensation for  
23 actual, necessary services rendered by the trustee, examiner,  
professional person, or attorney and by any paraprofessional person  
employed by any such person; and  
(B) reimbursement for actual, necessary expenses.

24 11 U.S.C. §330.

25 In the Ninth Circuit, the test for calculating a reasonable attorney’s fee under 11 U.S.C. § 330  
26 is the lodestar method. “The primary method used to determine a reasonable attorney fee in a  
27 bankruptcy case is to multiply the number of hours expended by an hourly rate.” *Id.* at 1471. *In re*  
28

1 *Yermakov*, 718 F.2d 1465, 1471 (9th Cir. 1983). This lodestar or basic fee, if warranted, can then be  
2 adjusted upward or downward. *In re Powerine Oil Co.*, 71 B.R. 767 (9th Cir. BAP 1986).

3 Services which were not “reasonably likely to benefit the estate” or were not “necessary to  
4 the administration of the case” are not compensable. 11 U.S.C. § 330(a)(4). In considering a fee  
5 award, the court must consider “whether the services were necessary to the administration of, or  
6 beneficial **at the time at which the service was rendered** toward the completion of, a case.”

7 11 U.S.C. § 330(a)(3)(C) (emphasis added); *Roberts, Sheridan & Kotel, P.C. v. Bergen Brunswig*  
8 *Drug Co. (In re Mednet)*, 251 B.R. 103, 108 (9th Cir. BAP 2000) (“...the applicant must  
9 demonstrate only that the services were ‘reasonably likely’ to benefit the estate at the time the  
10 services were rendered.”); *see, e.g., Mohsen v. Wu (In re Mohsen)*, 506 B.R. 96, 106-10 (N.D. Cal.  
11 2013).

12 In sum, the Firm has assisted the Trustee to realize the best possible outcome for this case  
13 and in working closely with Trustee, the sale of a 170-acre vineyard property, the Live Oak  
14 Property, was successfully executed at the fair market price of \$9.1 million, with a distribution to  
15 unsecured creditors from otherwise overencumbered property, and a distribution to FCW in excess  
16 of its minimum “floor” of \$8,250,000. The Firm’s services have provided a significant benefit to  
17 creditors and Trustee’s administration of the case would not have been possible without the  
18 substantial support from the Firm. Based upon the foregoing points and authorities and the  
19 declarations and the attached exhibits, the Firm believes that the fees and costs requested are  
20 reasonable given the benefit conferred on the Estate’s creditors.

21 **3. Conclusion**

22 The Firm requests that this Court enter its Order as follows:

23 (1) Approving and allowing the Firm’s interim fees during this Reporting Period in the  
24 amount of \$266,530;

25 (2) Approving and allowing the Firm’s interim reimbursement of the Firm’s interim costs  
26 during this Reporting Period in the amount of \$6,915.79;

27 (3) Authorizing, in connection with the concurrent motion to authorize cash  
28

1 disbursements from collateral proceeds of the Live Oak Property, a payment of \$106,000 to the Firm  
2 as a partial payment of allowed interim compensation;

3 (4) Authorizing Trustee to pay any other interim compensation as unencumbered or  
4 designated funds become available, in the Trustee's business judgment and/or pursuant to a further  
5 order of the Court;

6 (5) Authorizing Trustee to pay the Firm the costs approved/allowed during this Reporting  
7 Period as funds become available; and

8 (6) For such other and further relief as the Court deems proper.

9  
10 DATED: April 14, 2022

MARSHACK HAYS LLP

/s/ Tinhong Mang

11 By: \_\_\_\_\_  
12 D. EDWARD HAYS  
13 TINHO MANG  
14 Applicant and Attorneys for Chapter 7 Trustee,  
15 RICHARD A. MARSHACK  
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## Declaration of Tinhon Mang

I, TINHO MANG, say and declare as follows:

1. I am an individual over 18 years of age and competent to make this declaration.

2. If called upon to do so, I could and would competently testify as to the facts set forth in this Declaration. The facts set forth below are true of my personal knowledge.

3. I am an attorney at law duly admitted to practice before this Court and all courts of the State of California.

4. I am an associate of the law firm of Marshack Hays LLP, attorneys for Richard A. Marshack, the Chapter 7 Trustee ("Trustee") for the Bankruptcy Estate ("Estate") of Northern Holding, LLC ("Debtor") and maintain offices at 870 Roosevelt, Irvine, California, 92620.

5. Unless otherwise stated, the facts set forth in this declaration are personally known to me and if called as a witness, I could and would competently testify thereto.

6. All terms not otherwise defined herein are used as they are defined in the Motion.

7. I make this declaration in support of the Firm's First Interim Application for Allowance of Fees and Costs ("Application"). All terms not otherwise defined herein are used as they are defined in the Application.

8. This Application encompasses services rendered and expenses paid or incurred during the ten month period from June 15, 2022, through and including March 31, 2022 ("Reporting Period").

9. The Firm has not previously filed an application for payment of fees and costs in this case. The Firm understands that funds on hand are insufficient to pay all allowable fees and costs.

10. With the consent of the supervising attorneys at the Firm, I am the designated professional responsible for overseeing the billing in this matter and for assuring compliance with the Guidelines for the United States Trustee related to billing.

11. With the exception of the general sharing of compensation between members and employees of the Firm, no agreement or understanding exists between the Firm and any other

1 individual or entity for the sharing of compensation to be received for services rendered or the  
2 reimbursement of costs incurred in or in connection with this case.

3 12. On October 28, 2020 (“Petition Date”), Northern Holding, LLC, a Minnesota limited  
4 liability company (“Debtor”) filed a voluntary petition under Chapter 11 of Title 11 of the United  
5 States Code. Debtor’s managing member was Leroy E. Coddling IV (“Mr. Coddling”).

6 13. On June 15, 2021, the case was converted to Chapter 7. Richard A. Marshack was  
7 appointed as the Chapter 7 trustee.

8 14. On July 15, 2021, as Dk. No. 136, Trustee filed an application to employ Marshack  
9 Hays LLP as general counsel (“Employment Application”). On August 11, 2021, as Dk. No. 190, the  
10 Court entered an order granting the Employment Application (“Employment Order”).

11 15. A true and correct copy of the Employment Order is attached as **Exhibit 1**.

12 16. A true and correct copy of the schedule of fees requested by the Firm during the  
13 relevant time period is attached to this declaration as **Exhibit 2**.

14 17. A true and correct copy of the summary schedule of fees as recommended by the  
15 U.S. Trustee Guidelines is attached to this declaration as **Exhibit 3**.

16 18. A true and correct copy of the schedule of costs and expenses incurred or paid by the  
17 Firm during the relevant time period is attached to this declaration as **Exhibit 4**.

18 19. A true and correct copy of the summary schedule of costs as recommended by the  
19 U.S. Trustee Guidelines is attached to this declaration as **Exhibit 5**.

20 20. A true and correct copy of the Firm’s resume, containing a brief biographical  
21 description of the attorneys who rendered services for which compensation is sought by this  
22 Application, is attached to this declaration as **Exhibit 6**.

23 21. I believe that the Application covering the Reporting Period complies with the United  
24 States Trustee Guide for Applications for Professional Fee Compensation.

25 22. I have reviewed the requirements of Rule 2016-1 of the Local Bankruptcy Rules  
26 (“LBR”).



23. I have reviewed this Application, the attached billing records, and the attached records of costs in detail, and I believe that this Application complies with the provisions of LBR 2016-1.

24. The Firm requests that the Court enter an order allowing all of the Firm's incurred fees and costs for this Reporting Period (\$266,530 in fees and \$6,915.79 in costs, a total of \$273,445.79).

25. The Firm's services provided great value and benefit to the Estate and should be approved as reasonable.

26. At this time, the Firm only seeks to receive a distribution from funds which are specifically reserved for payment of its fees, which total \$106,000 from the reserved proceeds derived from the sale of the Live Oak Property. This is a payment of approximately 38.76% of the Firm's accrued fees and costs.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 14, 2022.

/s/ Tinho Mang  
TINHO MANG

**EXHIBIT 1**

1 D. EDWARD HAYS, #162507  
ehays@marshackhays.com  
2 DAVID A. WOOD, #272406  
dwood@marshackhays.com  
3 TINHO MANG, #322146  
tmang@marshackhays.com  
4 MARSHACK HAYS LLP  
870 Roosevelt Avenue  
5 Irvine, CA 92620  
Telephone: (949) 333-7777  
6 Facsimile: (949) 333-7778

7 Attorneys for Chapter 7 Trustee,  
RICHARD A. MARSHACK  
8



9 UNITED STATES BANKRUPTCY COURT

10 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION  
11

12 In re

13 NORTHERN HOLDING, LLC,

14 Debtor.  
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Case No. 8:20-bk-13014-MW

Chapter 7

ORDER GRANTING APPLICATION BY  
CHAPTER 7 TRUSTEE TO EMPLOY  
MARSHACK HAYS LLP AS GENERAL  
COUNSEL

APPLICATION DOCKET NO. 136

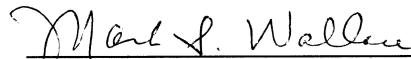
[UNOPPOSED MOTION – NO SERVICE  
OF PROPOSED JUDGMENT OR  
LODGMET PERIOD REQUIRED  
PURSUANT TO LBR 9021-1(b)(4)]

20  
21 The Court has read and considered the Application to Employ Marshack Hays LLP as  
22 General Counsel and the Declaration of D. Edward Hays in support (“Application”), filed by  
23 Chapter 7 Trustee Richard A. Marshack (“Trustee”) on July 15, 2021, as Dk. No. 136. The Court  
24 finds, based upon the proof of service of the Notice of Application filed on July 15, 2021, as Dk.  
25 No. 137, and the Declaration of Non-Opposition filed by Tinho Mang on August 3, 2021, as Dk.  
26 No. 171, that proper notice of the Application has been given and no opposition has been received.  
27 Accordingly, the Court finds good cause to grant the Application, and the Court enters its Order as  
28 follows:

1 IT IS ORDERED that the Trustee's Application to employ Marshack Hays LLP as the  
2 estate's general counsel in this case as of June 15, 2021, pursuant to 11 U.S.C. § 327 is approved.  
3 Any compensation or reimbursement of costs shall only be paid upon application to and approval  
4 by the Court pursuant to 11 U.S.C. §§ 330 or 331.

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23 Date: August 11, 2021

  
Mark S. Wallace  
United States Bankruptcy Judge

**EXHIBIT 2**



March 31, 2022

Richard Marshack, Trustee  
870 Roosevelt Avenue  
Irvine, CA 92620

Invoice # 13964  
Client # 1015  
Matter # 146

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### INVOICE SUMMARY

For Professional Services Rendered for the period ending: March 31, 2022

**Re: Northern Holding, LLC**

Current Fees	\$ 266,530.00
Current Disbursements	<u>\$ 6,915.79</u>
<b>TOTAL CURRENT CHARGES</b>	<b>\$ 273,445.79</b>

MARSHACK HAYS LLP

Richard Marshack, Trustee  
Client-Matter# 1015-146

March 31, 2022  
Invoice # 13964

**FEES**

.1 SLO Property Tax negotiations

Date	Atty	Description	Hours	Rate	Amount
11/15/21	KAT	Review and analyze San Marco tax sale notice and taxes showing owing (.30); Telephone conference Nick Quincey re: property taxes (.20); E-mail correspondence to Nick Quincey re: taxes (.10);	.60	550.00	330.00
11/17/21	TM	Review property tax bills and written correspondence to Kristine A. Thagard and Richard A. Marshack re: rough breakdown of same;	.20	350.00	70.00
11/17/21	TM	Telephone conference with Kristine A. Thagard re: analysis of tax penalty and avoidance issues, benefit to secured creditor;	.20	350.00	70.00
2/25/22	KAT	Research re: 724 lien avoidance and draft letter to Nick Quincy at San Luis Obispo County (2.50); Further revisions to letter and e-mail correspondence to Tinho Mang re: same (.30); Telephone conference with Tinho Mang re: claim (.20); further revisions to letter and e-mail correspondence with Layla Buchanan (.30); E-mail correspondence to Nick Quincy re: avoidance (.20);	3.50	550.00	1,925.00
2/25/22	TM	Revise and research negotiation letter to SLO County and written correspondence with Kristine A. Thagard re: same;	.40	350.00	140.00
2/25/22	TM	Telephone conference with Kristine A. Thagard re: discussion of tax letter to County;	.10	350.00	35.00
2/28/22	KAT	E-mail correspondence with Jon Ansolabehere , San Luis Obispo Counsel re: demand (multiple) (.20); Telephone conference with Tinho Mang and Michael Gomez (part) re: end game (.30); Telephone conference with Kevin Otis re: San Marco tax issues and effect on sale (.10); Telephone conference with Richard A. Marshack re: County negotiations (.10);	.70	550.00	385.00
2/28/22	TM	Telephone conference with Kristine A. Thagard and Michael Gomez re: tax issue and discussion of possible strategy options to address County;	.20	350.00	70.00
3/02/22	KAT	Prepare for telephone conference with Jon Ansolabehere at San Luis Obispo County re: penalties and review relevant arguments (.40); Telephone conference with Jon A. re: penalties and potential resolution (.40);	.80	550.00	440.00
3/03/22	KAT	Telephone conference with Richard A. Marshack re: penalty negotiations with county (.20);	.20	550.00	110.00
3/07/22	KAT	Telephone conference with Richard A. Marshack re: potential deal on property taxes (.20);	.20	550.00	110.00

MARSHACK HAYS LLP

Richard Marshack, Trustee  
Client-Matter# 1015-146

March 31, 2022  
Invoice # 13964

Date	Atty	Description	Hours	Rate	Amount
3/08/22	KAT	E-mail correspondence from Jon Ansolabehere at County Counsel's office re: penalties and interest and e-mail correspondence to Tinho Mang and Richard A. Marshack re: same (.30);	.30	550.00	165.00
3/09/22	KAT	Analysis of County position and Telephone conference Tinho Mang re: same (.20); Draft response to County (.40);	.60	550.00	330.00
3/09/22	TM	Telephone conference with Kristine A. Thagard re: negotiating position with tax authorities;	.10	350.00	35.00
3/10/22	KAT	Telephone conference with Richard A. Marshack re: status of dealing with county tax collector (.20); E-mail correspondence from Jon A. at County and review cited authority (.30);	.50	550.00	275.00
3/21/22	KAT	Analysis of position of County (.20); E-mail correspondence to Jon A. re: position, cases and moving forward (.30); Telephone conference with Kevin Otus re: County position (.20); E-mail correspondence from Jon Ansolabehere (.10);	.80	550.00	440.00
3/22/22	KAT	E-mail correspondence with Jon Ansolabehere, County Counsel re: tax negotiations (.10); Telephone conference with Richard A. Marshack and Kevin Otus re: tax negotiations (.20); Telephone conference Jon Ansolabehere re: reduction in interest rate (.30); Telephone conference with Richard A. Marshack (part) and Kevin Otus re: reduction in interest rate (.30);	.90	550.00	495.00
3/23/22	KAT	Telephone conference with Tinho Mang re: negotiations with County (.30); Telephone and e-mail correspondence with Jon A. re: offers/counters and information needed (multiple) (.40); E-mail correspondence with Richard A. Marshack re: negotiations (.10);	.80	550.00	440.00
3/24/22	KAT	Telephone conference with David A. Wood re: negotiations with county (.10); Correspondence with Richard A. Marshack re: negotiations with county (.10); Telephone conference with Richard A. Marshack and D. Edward Hays potential agreement (.40);	.60	550.00	330.00
3/28/22	KAT	E-mail correspondence with Jon A. re: offer on taxes (.20);	.20	550.00	110.00
3/30/22	KAT	Telephone conference with Tinho Mang re: tentative deal with county and timing (.30);	.30	550.00	165.00
3/31/22	KAT	E-mail correspondence from SLO County re: additional cases and analysis of same (.20); Telephone conference with Tinho Mang re: offer and cases (.20); Prepare reply to SLO (.20);	.60	550.00	330.00
3/31/22	TM	Research re: tax avoidance issues and arguments raised by county and telephone conference with Kristine A. Thagard and David A. Wood re: response and likelihood of success in avoidance litigation;	1.40	350.00	490.00
<b>Sub-Total Fees:</b>			<b>14.20</b>		<b>\$ 7,290.00</b>



MARSHACK HAYS LLP

Richard Marshack, Trustee  
Client-Matter# 1015-146

March 31, 2022  
Invoice # 13964

1 Asset Analysis and Recovery

Date	Atty	Description	Hours	Rate	Amount
6/14/21	DAW	Review and analyze schedules, SOFA, and related pleadings in case for background information;	1.50	490.00	735.00
6/14/21	DAW	Further conference with Richard A. Marshack and Marilyn Sorensen re: Rabbit Ridge lease and Russell Lease;	.80	490.00	392.00
6/14/21	DAW	Conference call with Trustee, Reed Waddell and Michael Gomez re: background information and strategy moving forward;	1.30	490.00	637.00
6/15/21	DAW	Review and analyze appraisal of vineyards provided by Farm West;	.50	490.00	245.00
6/15/21	DAW	Conference with Paul Buie at Onyx Asset Advisors re: potential value and interest in the property and winery operations;	.50	490.00	245.00
6/17/21	DAW	Draft and send e-mail correspondence to Lee Coddling, Paul Buie, Kevin Otus, and Trustee re: arranging visit by Onyx to properties for inspection and marketing strategy;	.20	490.00	98.00
6/17/21	DAW	Conference with Trustee re: insurance and inventory issues (.20); Conference with Lori Ensley re: same (.10); Draft and send e-mail correspondence to Matt Resnick and Lee Coddling re: same and information for insurance payment (.10);	.40	490.00	196.00
6/17/21	DAW	Review and analyze Debtor's schedules, APA with Rabbit Ridge and various leases;	1.60	490.00	784.00
6/17/21	DAW	Review and respond to e-mail correspondence from Paul Buie re: acreage calculations for each of properties;	.20	490.00	98.00
6/18/21	DAW	Review and investigate status of Debtor's insurance policy and potential cancellation due to non payment and bad check issued by the Debtor to the broker (.70); Multiple conferences with Pam Kraus re: same (.30); Conference with Trustee, Michael Gomez, and Reed Waddell counsel for Farm West re: same (.90); Review and respond to multiple e-mail correspondence from Lee Coddling re: same (.20); Conference call with Tinho Mang re: research for violation of stay for cancellation of insurance policy without the Court's approval (.10); Conference with Kristine A. Thagard re: lease termination agreements (.10);	2.30	490.00	1,127.00
6/20/21	KAT	Review existing leases (.40); Draft and revise cancellation of lease agreement (3.50); E-mail correspondence with Pam Kraus re: insurance policies, review Admiral policy and contact information (.50); E-mail correspondence with Pam Kraus re: certificate naming Debtor, review same and policy (.30);	4.70	550.00	2,585.00

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Date	Atty	Description	Hours	Rate	Amount
6/21/21	DAW	Review and analyze the COI and various insurance policies received by Estate from broker;	.50	490.00	245.00
6/22/21	DAW	Conference with Trustee and Reed Waddell re: ongoing negotiations with Bank for payment of insurance policies and strategy moving forward;	.60	490.00	294.00
6/22/21	DAW	Conference with Cary Adler insurance broker re: reinstatement of various policies;	.30	490.00	147.00
6/23/21	KAT	Preliminary review of insurance policy coverage and e-mail correspondence to David A. Wood re: same (multiple) (.50);	.50	550.00	275.00
6/23/21	DAW	Conference with Trustee and Kevin Otus re: tour of properties and facilities today;	.60	490.00	294.00
6/23/21	DAW	Conference with Kevin Otus, Paul Buie, Trustee, and Lori Ensley re: recap of the tour of the three properties, the wine production facility, and the residence;	.90	490.00	441.00
6/23/21	DAW	Multiple follow-up conferences with Paul Buie, Kevin Otus , and Trustee re: tour of properties today (No Charge);	.50	490.00	N/C
6/24/21	KAT	E-mail correspondence from Pam Kraus re: Admiral Excess Policy and named insureds (.10); Review and analyze named insured issues under policies and prepare response (.40);	.50	550.00	275.00
6/24/21	DAW	Review and respond to multiple e-mail correspondence from Reed Waddell, Paul Buie, Kevin Otus, and Trustee re: strategy moving forward and call today at 3:15;	.30	490.00	147.00
6/24/21	DAW	Conference with Trustee and Kevin Otus re: strategy for call with Farm Credit West;	.40	490.00	196.00
6/24/21	DAW	Conference call with Trustee, Onyx Asset Advisors, Farm Credit West and their counsel re: information obtained and strategy moving forward;	1.40	490.00	686.00
6/25/21	KAT	Telephone conference with David A. Wood re: insurance policies (.20);	.20	550.00	110.00
6/25/21	DAW	Conference with Reed Waddell re: insurance coverage and advancement of the monthly premiums (.30); Review and respond to multiple e-mail correspondence from Cary Adler and Reed Waddell re: requested information for the monthly premium payments to be made (.20);	.50	490.00	245.00
6/26/21	KAT	Analysis of E-mail chain re: insurance (.20); Review and analyze Bank Direct contracts and prepare potential arguments for continuing with Bank Direct contract and funding (.50);	.70	550.00	385.00

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Date	Atty	Description	Hours	Rate	Amount
6/28/21	KAT	E-mail correspondence to Richard Twardowski re: Bank Direct contract (.10); Telephone call (detailed message) to Robert Borrelli (Bank Direct) re: insurance and finance agreement (.10);	.20	550.00	110.00
6/29/21	KAT	Telephone conference with Richard Twardowski (.40); Review notes re: conversation and issues (.30); Telephone conference David A. Wood re: insurance issues (.30); Research re: general agent-Worldwide Faculties to add bank as additional insured (.40); E-mail correspondence to David A. Wood re: conversation and research (.30); Telephone conference with Steven Legum re: cancellation and payment (.20); E-mail correspondence to Steven Legum (.10); E-mail correspondence from Richard Twardowski re: bank payment information and confirmation of non cancellation (.20); E-mail correspondence to David A. Wood re: needed information for bank (.20); Research Stock Throughput insurance (.20); Review e-mails from David A. Wood to Bank and counsel re: insurance issues (multiple) (.20);	2.80	550.00	1,540.00
6/29/21	DAW	Conference with Kristine A. Thagard re: confirmation from Bank Direct that they will not cancel the insurance policies (No Charge);	.30	490.00	N/C
7/01/21	KAT	E-mail correspondence with David A. Wood and bank attorney re: issuance issues (.20); Telephone conference with Richard Twardowski re: insurance payment (.20); Telephone conference with David A. Wood re: insurance payment, coverages and cancellation (.20); Review cancellation of home and existing policies for potential coverage (.70); E-mail correspondence to Richard Twardowski confirming non-cancellation (.10); E-mail correspondence to David A. Wood re: other coverages (.20); E-mail correspondence from Richard Twardowski re: non cancellation and information re: general agent and e-mail correspondence to David A. Wood re: same (.20); Review e-mail correspondence from bank re: outstanding issues (6+) (.20);	2.00	550.00	1,100.00
7/02/21	LB	Conference with David A. Wood re: preparation of motion to compel turnover of Live Oak Property (.10); Review case file (.20); Draft motion to compel turnover and declaration of Richard A. Marshack in support of same (.80); Draft application for hearing on shortened time (.20); Draft proposed order re: same (.10); Draft declaration of David A. Wood in support of motion (.20);	1.60	260.00	416.00
7/02/21	KAT	Telephone conference David A. Wood re: notices to pay or quit and insurance (.20); Review current law for eviction, and extension of COVID protection and procedures (.90); Review current forms for 15 day notice and required notices to tenant and analysis of issues (.50); Telephone conference and multiple e-mails with David A. Wood re: eviction issues (.40); E-mail correspondence from David A. Wood re: COVID moratorium extension and 15 day notice and provide response with documentation (.50);	2.50	550.00	1,375.00

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Date	Atty	Description	Hours	Rate	Amount
7/02/21	TM	Multiple written correspondences with David A. Wood and Richard A. Marshack re: turnover of bankruptcy estate property and applicability of moratoria on evictions;	.30	350.00	105.00
7/05/21	DAW	Begin research and draft motion for turnover of property of estate;	3.20	490.00	1,568.00
7/06/21	LB	Conference with David A. Wood re: preparation of motion to compel turnover (.10); Review and revise proposed order on order shortening time re: motion (.10); Review and revised declaration of David A. Wood in support of application for order shortening time (.20); Review and revise application re: same (.10);	.50	260.00	130.00
7/06/21	LB	Review and revise motion for turnover and declarations of Richard A. Marshack and Lori Ensley (.30); Draft table of contents and table of authorities (.30); Preparation of evidence in support of same (.20);	.80	260.00	208.00
7/06/21	DAW	Draft and revise motion for turnover of property of Estate as to residence, properties, and wine facility;	2.80	490.00	1,372.00
7/06/21	TM	Telephone conference with David A. Wood re: discussion of turnover motion and review thereof;	.20	350.00	70.00
7/06/21	TM	Review, revise, and supplement turnover motion and legal research re: same, written correspondence to trustee re: additional occupants identified in February 2021 MOR;	1.50	350.00	525.00
7/07/21	DEH	E-mail correspondences with David A. Wood re: revisions of motion for turnover;	.60	650.00	390.00
7/07/21	DAW	Conference with D. Edward Hays re: motion for turnover;	.40	490.00	196.00
7/08/21	DAW	Review and revise edits by D. Edward Hays to motion for turnover and confirmation that CDC guidelines do not apply (.30); Draft and send lengthy e-mail correspondence to Reed Waddell, D. Edward Hays, Trustee, and Michael Gomez re: proposed edits and procedural issue (.20);	.50	490.00	245.00
7/09/21	DAW	Review and respond to multiple e-mail correspondence from Elissa Miller proposed counsel for Bank Direct re: negotiations with Farm Credit West to advance the insurance premiums (.20); Conference with Elissa re: same (.20);	.40	490.00	196.00
7/14/21	TM	Review and conform revisions to motion for turnover from David A. Wood, revise declaration according to supplemental information in motion, written correspondence to Richard A. Marshack re: schedule for filing;	.30	350.00	105.00
7/15/21	DAW	Review and respond to 12+ e-mail correspondence from Trustee, Layla Buchanan, and Tinho Mang re: edits to motion for turnover and budget we provided to Bank;	.30	490.00	147.00
7/15/21	TM	Telephone conference with Richard A. Marshack re: review and discussion of turnover motion;	.40	350.00	140.00

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Date	Atty	Description	Hours	Rate	Amount
7/15/21	TM	Written correspondence with Richard A. Marshack re: possible delinquent property taxes and review title reports re: same;	.30	350.00	105.00
7/15/21	TM	Revise and supplement turnover motion per concerns from Farm Credit and discussion with Richard A. Marshack;	2.40	350.00	840.00
7/16/21	DAW	Review and analyze multiple lengthy e-mail correspondence from Michael Gomez and Tinho Mang re: property tax on the various properties (No Charge);	.20	490.00	N/C
7/16/21	DAW	Review and analyze multiple e-mail correspondence from Michael Gomez re: comments to the turnover motion;	.20	490.00	98.00
7/19/21	KAT	Telephone conference with Tinho Mang re: lease terminations and recovery of property and insurance issues (.40);	.40	550.00	220.00
7/19/21	DAW	Review and analyze lengthy e-mail correspondences from Trustee and Lee Codding re: turnover negotiations;	.20	490.00	98.00
7/19/21	TM	Telephone conference with Richard A. Marshack re: review of turnover motion;	.20	350.00	70.00
7/19/21	TM	Telephone conference with Richard A. Marshack re: preparation of turnover stipulation;	.10	350.00	35.00
7/19/21	TM	Telephone conference with Pam Kraus re: extent of insurance and whether premium finance payments are current;	.10	350.00	35.00
7/19/21	TM	Telephone conference with Elissa Miller re: discussion with counsel for insurance premium finance company re: nonpayment of insurance premium;	.30	350.00	105.00
7/19/21	TM	Draft turnover stipulations for both properties and written correspondence to Richard A. Marshack re: same;	1.70	350.00	595.00
7/19/21	TM	Telephone conference with Kristine A. Thagard re: lease termination issues under state law and issues with funding of insurance premium payments;	.40	350.00	140.00
7/20/21	DAW	Review and respond to multiple e-mail correspondence from Tinho Mang and Lori Ensley re: updated budget and response to Bank Direct's relief from stay;	.20	490.00	98.00
7/20/21	TM	Telephone conference with Richard A. Marshack re: review and revision of turnover stipulations and discussion of strategy;	.80	350.00	280.00
7/20/21	TM	Telephone conference with Richard A. Marshack re: supplement and revisions to San Marcos turnover stipulation, revise accordingly, written correspondence to Lee Codding re: same;	.20	350.00	70.00
7/20/21	TM	Telephone conference with Richard A. Marshack and Lee Codding re: discussion of insurance issues;	.10	350.00	35.00

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Date	Atty	Description	Hours	Rate	Amount
7/20/21	TM	Telephone conference with Lori Ensley and Richard A. Marshack re: discussion of asset analysis and insurance issues;	.10	350.00	35.00
7/21/21	TM	Telephone conference with Pam Kraus re: demand letter for client file, insurance issues, case strategy, asset preservation and analysis, outstanding contracts, inventory, rentals;	1.00	350.00	350.00
7/21/21	TM	Telephone conference with Lee Codding re: asset analysis, outstanding executory contracts, insurance issues, maximizing revenue and asset values;	1.20	350.00	420.00
7/21/21	TM	Multiple written correspondences with Lori Ensley re: revision to operating budget and verification of inventory lists;	.20	350.00	70.00
7/21/21	TM	Multiple written correspondences with Lee Codding re: proposed revisions to turnover stipulations;	.10	350.00	35.00
7/21/21	TM	Telephone conference with Richard A. Marshack re: turnover stipulations and continuous occupancy of land, ensuring crops are adequately tended;	.20	350.00	70.00
7/22/21	KAT	Telephone conference with Richard A. Marshack and Tinho Mang re: insurance policies (.20);	.20	550.00	110.00
7/22/21	TM	Telephone conference with Richard A. Marshack, Kristine A. Thagard, Pam Kraus, and Lee Codding re: discussion of insurance issues;	.60	350.00	210.00
7/23/21	DAW	Review and analyze multiple e-mail correspondence from Reed Waddell, Michael Gomez, and Pam Kraus re: California tax assessment (No Charge);	.30	490.00	N/C
7/23/21	TM	Telephone conference with Richard A. Marshack re: case status and farming agreement, insurance loss payee;	.10	350.00	35.00
7/23/21	TM	Written correspondence with Lee Codding re: apparent agreement from broker to add trustee as loss payee on insurance;	.10	350.00	35.00
7/27/21	LB	Conference with Tinho Mang re: preparation of stipulation for turnover of San Marcos Property (.10); Draft proposed order re: same (.20);	.30	260.00	78.00
7/27/21	TM	Telephone conference with and written correspondence to Richard A. Marshack re: signature version for turnover stipulation and farm agreement;	.10	350.00	35.00
7/27/21	TM	Draft and revise order on turnover stipulation for San Marcos;	.10	350.00	35.00
7/28/21	TM	Written correspondence with Pam Kraus re: summary of case for insurance underwriting;	.30	350.00	105.00
7/28/21	TM	Written correspondence with Pam Kraus and Reed Waddell re: extent of insurance coverage for estate;	.10	350.00	35.00

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Date	Atty	Description	Hours	Rate	Amount
7/28/21	TM	Telephone conference with Richard A. Marshack and Lee Coddling re: discussion of turnover stipulation for Live Oak and revise accordingly, written correspondence to Richard A. Marshack re: revised version;	.30	350.00	105.00
7/28/21	TM	Multiple written correspondences with Michael Gomez and Richard A. Marshack re: discussion of Bill Tolar lease;	.20	350.00	70.00
7/29/21	TM	Written correspondence with Lee Coddling re: Russell objections to Live Oak turnover stipulation and revise accordingly;	.30	350.00	105.00
7/29/21	TM	Telephone conference with Lee Coddling and Richard A. Marshack re: final negotiations for turnover and deadline to commence litigation if turnover stipulation is not signed;	.30	350.00	105.00
7/30/21	LB	Conference with Tinho Mang re: preparation of demand for turnover letter to Resnik Hayes Moradi LLP;	.10	260.00	26.00
7/30/21	TM	Draft turnover demand letter for DIP counsel and written correspondence with Pam Kraus re: same;	.70	350.00	245.00
7/30/21	TM	Telephone conference with Richard A. Marshack and Lee Coddling re: discussion of filing turnover adversary if stipulation on Live Oak is not signed;	.20	350.00	70.00
8/02/21	DEH	Telephone conference with Richard A. Marshack and Tinho Mang re: motion to compel turnover;	.20	650.00	130.00
8/02/21	LB	Conference with Tinho Mang re: preparation of notice of turnover motion (.10); Review case file (.10); Draft notice of motion re: same (.30);	.50	260.00	130.00
8/02/21	LB	Conference with Tinho Mang re: preparation of turnover motion (.10); Draft table of contents and table of authorities (.30); Review and finalize motion and declaration of Richard A. Marshack (.50); Review and finalize notice of motion (.20); Preparation of evidence in support of motion (.20);	1.30	260.00	338.00
8/02/21	DAW	Review and analyze Trustee's motion for turnover of property of Estate for the Live Oak Property;	.70	490.00	343.00
8/02/21	TM	Written correspondence with Lee Coddling re: confirming Russells' failure to sign turnover stipulation;	.10	350.00	35.00
8/02/21	TM	Telephone conference with Richard A. Marshack and Lee Coddling re: turnover litigation to be commenced for Live Oak;	.20	350.00	70.00
8/02/21	TM	Draft, revise, and supplement turnover motion for Live Oak based on recent developments and expiration of CDC order;	4.30	350.00	1,505.00
8/02/21	TM	Draft and revise notice of turnover motion;	.10	350.00	35.00
8/04/21	TM	Review new CDC eviction moratorium;	.20	350.00	70.00



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Date	Atty	Description	Hours	Rate	Amount
8/05/21	TM	Further revise order on turnover of San Marcos per Richard A. Marshack requests;	.20	350.00	70.00
8/06/21	TM	Telephone conference with Richard A. Marshack and Lee Codding re: discussion of turnover by Russells and negotiation for Live Oak turnover;	.50	350.00	175.00
8/09/21	TM	Review and analyze response to turnover motion and demand letter from Kari Ley (attorney for Russell);	.40	350.00	140.00
8/09/21	TM	Telephone conference with Richard A. Marshack re: response to turnover letter and written correspondence with D. Edward Hays re: same;	.20	350.00	70.00
8/09/21	TM	Telephone conference with Richard A. Marshack and Lee Codding re: analysis of response to turnover motion from Russell and discussion of consulting agreement terms, offsets;	.60	350.00	210.00
8/09/21	TM	Review unsigned Rabbit Ridge/Russell consulting agreement from Lee Codding and telephone conference with Richard A. Marshack re: discussion of same;	.40	350.00	140.00
8/09/21	TM	Draft and research supplement to turnover motion for Live Oak to include new CDC order, telephone conference with Richard A. Marshack re: approval for same;	2.10	350.00	735.00
8/10/21	TM	Written correspondence with Cary Adler re: loss runs from insurance policies;	.10	350.00	35.00
8/16/21	KAT	E-mail correspondence with D. Edward Hays and David A. Wood (multiple) re: title issues (.20); Telephone conference with David A. Wood re: ongoing issues with lender (.20);	.40	550.00	220.00
8/16/21	TM	Multiple written correspondences with Richard A. Marshack, D. Edward Hays, David A. Wood, and Kristine A. Thagard re: discussion of title issues and negotiations with Farm Credit;	.40	350.00	140.00
8/16/21	TM	Written correspondence with Kari Ley re: response to inquiry on dispute over turnover motion;	.20	350.00	70.00
8/16/21	TM	Written correspondence with Kari Ley re: negotiations for turnover of Live Oak and revise proposed stipulation re: same;	.30	350.00	105.00
8/16/21	TM	Review insurance quote and written correspondence with Pam Kraus re: expiration of preexisting insurance and deadline to pay;	.10	350.00	35.00
8/17/21	LB	Review opposition to motion for turnover (.10); Conference with D. Edward Hays re: preparation of reply (.10); (No Charge)	.20	260.00	N/C
8/17/21	TM	Review and analyze late-filed opposition to turnover motion and written correspondence to Kari Ley re: same;	.60	350.00	210.00



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Date	Atty	Description	Hours	Rate	Amount
8/17/21	TM	Written correspondence with Reed Waddell re: negotiations for turnover and telephone conference with Reed Waddell re: discussion and negotiation of various matters set for hearing on August 30, resolution of issues by stipulation;	.90	350.00	315.00
8/17/21	TM	Detailed written correspondence to Richard A. Marshack re: summary of proposed stipulated resolutions of matters set for hearing on August 30;	.30	350.00	105.00
8/17/21	TM	Review evidence and supplemental declarations in opposition to turnover motion filed by Russell and begin drafting reply;	1.40	350.00	490.00
8/18/21	TM	Written correspondence with Richard A. Marshack and Kevin Otus re: proposed stipulated resolutions of disputed items between Farm Credit and trustee;	.10	350.00	35.00
8/19/21	TM	Written correspondence to Kari Ley re: trustee's counter-offer on turnover stipulation;	.20	350.00	70.00
8/19/21	TM	Further written correspondence with Kari Ley re: negotiations for turnover;	.10	350.00	35.00
8/19/21	TM	Further written correspondence with Kari Ley re: turnover negotiations and whether Garrett children will also stipulate to turnover;	.20	350.00	70.00
8/19/21	TM	Continue drafting reply in support of turnover;	1.40	350.00	490.00
8/20/21	DEH	Telephone conference with Tinho Mang re oppositions and strategy for replies and potential conflict with buyer's counsel;	.20	650.00	130.00
8/20/21	TM	Telephone conference with Kari Ley re: further negotiations for turnover stipulation;	.40	350.00	140.00
8/20/21	TM	Telephone conference with Richard A. Marshack and Kari Ley re: turnover negotiations, discussion of case history and dynamics, harvesting crop, other settlement negotiations;	1.00	350.00	350.00
8/20/21	TM	Review workers' compensation insurance policy from Lee Coddling and written correspondence to Lee Coddling re: verification of same;	.20	350.00	70.00
8/20/21	TM	Revise and supplement stipulation for turnover of Live Oak per telephone call with Kari Ley;	.60	350.00	210.00
8/20/21	TM	Telephone conference with Richard A. Marshack re: turnover negotiations;	.30	350.00	105.00
8/20/21	TM	Review alleged consulting agreement from Kari Ley and written correspondence with Kari Ley re: same;	.20	350.00	70.00
8/23/21	DEH	Review and revise reply brief (.80); Written correspondence with Tinho Mang re: same (.20);	1.00	650.00	650.00

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8/23/21	KAT	Review preliminary title report for debt, prepare summary and e-mail correspondence to David A. Wood, Joshua Teeple, Kevin Otus and Paul Buie re same (.80);	.80	550.00	440.00
8/23/21	TM	Review entered order granting turnover from Rabbit Ridge and changes from court;	.10	350.00	35.00
8/23/21	TM	Finish drafting reply in support of turnover;	3.40	350.00	1,190.00
8/23/21	TM	Review and incorporate D. Edward Hays revisions to reply and written correspondence with D. Edward Hays re: same;	.10	350.00	35.00
8/24/21	TM	Telephone conference with Richard A. Marshack re: revision to turnover stipulation and terms for turnover of Live Oak, status of marketing and case strategy with secured creditor;	.40	350.00	140.00
8/24/21	TM	Revise turnover stipulation and written correspondence with Kari Ley re: same;	.20	350.00	70.00
8/24/21	TM	Written correspondence to Reed Waddell re: proposal from bank to secure San Marcos property;	.10	350.00	35.00
8/26/21	TM	Written correspondence with Kari Ley re: re-sending turnover stipulation (No Charge);	.10	350.00	N/C
8/26/21	TM	Telephone conference with Kevin Otus re: marketing strategy and discussion of timeline for sale, negotiations with secured creditor;	.30	350.00	105.00
8/26/21	TM	Telephone conference with Lee Coddling re: concern from Russell about farm labor, status of grape sale negotiations, arranging turnover for access to San Marcos;	.40	350.00	140.00
8/26/21	TM	Written correspondence with Kari Ley re: executed copy of stipulation for turnover of Live Oak property, review interlineations;	.20	350.00	70.00
8/27/21	DEH	Telephone conference with Tinho Mang re: tentative ruling granting motion for turnover;	.20	650.00	130.00
8/27/21	DEH	Review and analyze stipulation for turnover by Russells (.20); Telephone conference with Richard A. Marshack re same, tentative ruling granting motion to compel turnover, and status of sale negotiations (.20);	.40	650.00	260.00
8/27/21	LB	Conference with Tinho Mang re: preparation of request for judicial notice in support of supplement to turnover motion (.10); Review case file (.10); Draft request for judicial notice (.20);	.40	260.00	104.00
8/27/21	TM	Telephone conference with Reed Waddell re: settlement negotiations, securing properties, discussion of tentative ruling for turnover motion;	.50	350.00	175.00
8/27/21	TM	Review tentative rulings for Monday's hearings and brief telephone conference with D. Edward Hays re: same;	.10	350.00	35.00

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Date	Atty	Description	Hours	Rate	Amount
8/27/21	TM	Review SCOTUS ruling on August 3 CDC moratorium and written correspondence with D. Edward Hays re: same;	.30	350.00	105.00
8/27/21	TM	Telephone conference with Reed Waddell re: further negotiations on turnover;	.40	350.00	140.00
8/27/21	TM	Telephone conference with Richard A. Marshack re: turnover negotiations and counter-offer to Russells;	.20	350.00	70.00
8/27/21	TM	Telephone conference with Kari Ley re: possible negotiations for turnover settlement;	.10	350.00	35.00
8/27/21	TM	Preparation for hearings on Monday;	.70	350.00	245.00
8/30/21	DEH	Telephone conference with Tinho Mang re: hearing results (No Charge);	.20	650.00	N/C
8/30/21	LB	Conference with Tinho Mang re: preparation of Live Oak turnover stipulation (.10); Preparation of same (.10);	.20	260.00	52.00
8/30/21	TM	Multiple written correspondences with Kari Ley and Joanne Russell re: questions on stipulation with Garretts;	.20	350.00	70.00
8/30/21	TM	Revise stipulation for turnover per Richard A. Marshack and Kari Ley comments;	.40	350.00	140.00
8/30/21	TM	Multiple telephone conferences with Reed Waddell re: negotiations with secured creditor and stipulated turnover terms;	.30	350.00	105.00
8/30/21	TM	Written correspondence with Sarah Garrett and Brice Garrett re: discussion of stipulation terms and request to correct the record;	.20	350.00	70.00
8/30/21	TM	Preparation for and attendance at hearings on (1) joint employment application; (2) turnover; (3) relief from stay; and (4) farm operator agreement, multiple telephone conferences with Reed Waddell and Lee Codding re: same;	5.70	350.00	1,995.00
8/30/21	TM	Multiple telephone conferences with Kari Ley and Richard A. Marshack re: settlement of turnover issues;	.40	350.00	140.00
8/31/21	LB	Conference with Tinho Mang re: preparation of order on stipulation for turnover of Live Oak property (.10); Review case file (.10); Draft proposed order re: same (.30); Review and finalize stipulation for turnover (.20);	.70	260.00	182.00
8/31/21	LB	Review case file (.10); Draft order on motion for turnover (.30);	.40	260.00	104.00
9/02/21	LB	Conference with Tinho Mang re: revisions to turnover order (.10); Review and revise same (.10);	.20	260.00	52.00
9/02/21	TM	Written correspondence with Reed Waddell and Kari Ley re: review and approval of draft orders;	.10	350.00	35.00
9/03/21	TM	Leave voicemail for Kari Ley re: review of turnover order form;	.10	350.00	35.00

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Date	Atty	Description	Hours	Rate	Amount
9/07/21	TM	Written correspondence with Michael Gomez re: executing on turnover order against Garrett parties and proposed modifications to turnover order;	.20	350.00	70.00
9/07/21	TM	Revise turnover order and multiple written correspondences with Kari Ley re: same;	.30	350.00	105.00
9/08/21	TM	Telephone conference with Reed Waddell re: turnover order and clerical error in stay relief order;	.10	350.00	35.00
9/09/21	TM	Further revise turnover order and written correspondence with Kari Ley and Reed Waddell re: lodgment of order;	.20	350.00	70.00
9/10/21	LB	Conference with Tinh Mang re: order for approval of turnover (.10); Review and finalize proposed order (.20);	.30	260.00	78.00
9/10/21	TM	Telephone conference with Reed Waddell and written correspondence with Reed Waddell re: revised turnover order;	.10	350.00	35.00
9/13/21	TM	Review entered turnover order and written correspondence to Richard A. Marshack re: same;	.10	350.00	35.00
9/29/21	TM	Written correspondence with Reed Waddell re: notice of cancellation for Live Oak insurance;	.10	350.00	35.00
11/05/21	TM	Written correspondence to Lori Ensley and Kari Ley re: whether Russells have vacated property;	.10	350.00	35.00
11/08/21	TM	Written correspondence with Kevin Otus and Lee Codding re: securing Live Oak property;	.10	350.00	35.00
11/15/21	DAW	Review and respond to multiple e-mail correspondence from Pam Kraus and Trustee re: confirmation that the Russells have moved out of Live Oak;	.20	490.00	98.00
11/17/21	TM	Telephone conference with Reed Waddell (.40); Telephone conference with Pam Kraus re: securing property (.30);	.70	350.00	245.00
11/17/21	TM	Review written correspondence from Reed Waddell re: possible interference with property or Farm Credit's collateral;	.10	350.00	35.00
11/17/21	TM	Telephone conference with Lori Ensley re: update on property;	.10	350.00	35.00
11/22/21	TM	Revise authorization letter for security and written correspondence with Reed Waddell re: authorization from trustee to secure and rekey property;	.20	350.00	70.00
11/22/21	TM	Telephone conference with Richard A. Marshack and Kevin Otus re: sale negotiations, securing property and authorization;	.40	350.00	140.00
11/23/21	TM	Telephone conference with Richard A. Marshack, Kevin Otus, Kevin Ralph, and Michael Gomez re: securing property and appurtenant issues;	1.00	350.00	350.00

MARSHACK HAYS LLP

Richard Marshack, Trustee  
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Date	Atty	Description	Hours	Rate	Amount
12/01/21	TM	Telephone conference with Richard A. Marshack and Lee Coddling re: possession and turnover of properties based on requests from bank, request for report of who is currently on property;	.30	350.00	105.00
12/06/21	TM	Draft letter agreement re: possession;	.60	350.00	210.00
12/08/21	DAW	Multiple conferences with Paul Buie re: ongoing negotiations with bank;	.40	490.00	196.00
12/08/21	TM	Telephone conference with Reed Waddell and written correspondence with Reed Waddell re: settlement negotiations and confirming possession turnover procedures;	.30	350.00	105.00
12/08/21	TM	Telephone conference with Richard A. Marshack, Lori Ensley, and Kevin Otus re: turnover of possession to bank tomorrow;	.70	350.00	245.00
12/09/21	TM	Telephone conference with Lori Ensley re: lockout of Bill Tolar;	.10	350.00	35.00
12/09/21	TM	Telephone conference with Lori Ensley re: firearm located during lockout;	.10	350.00	35.00
12/09/21	TM	Telephone conference with Lori Ensley re: status of rekey by end of day and voluntary departure of unauthorized personnel;	.20	350.00	70.00
12/10/21	TM	Telephone conference with Richard A. Marshack re: turnover and signing of stipulation, review multiple written correspondences between Reed Waddell and Richard A. Marshack re: discussions about property;	.20	350.00	70.00
12/10/21	TM	Update letter agreement re: possession and written correspondence to Richard A. Marshack re: same;	.70	350.00	245.00
12/20/21	TM	Review Lexis searches for Lee Coddling and Steve Jones for assets or related entities, written correspondence with Lori Ensley re: same;	.30	350.00	105.00
1/11/22	TM	Written correspondence with Lewis Perdue re: possible undisclosed estate asset;	.10	350.00	35.00
1/12/22	TM	Review Northern Holdings client file from debtor's counsel and written correspondence with Matt Resnik and Roksana Moradi-Brovia re: corporate questions for title company;	1.80	350.00	630.00
1/27/22	TM	Review proposed farm management agreement with Alegre and written correspondence with Michael Gomez re: comments on same;	.20	350.00	70.00
3/03/22	DAW	Conference with Trustee re: water was found on the Live Oak Property and good chance of closing the sale by March 22, 2022;	.20	490.00	98.00
3/09/22	DAW	Conference with Paul Buie re: tours today for Texas Road and the adjacent property;	.20	490.00	98.00
3/15/22	DAW	Conference call with Paul Buie re: closing of Live Oak Property;	.20	490.00	98.00

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Date	Atty	Description	Hours	Rate	Amount
3/17/22	DAW	Review and respond to multiple e-mail correspondence from Kristine A. Thagard re: broker license for Onyx Asset Advisors;	.20	490.00	98.00
3/25/22	DEH	Telephone conference with Richard A. Marshack re: structure of agreement with county to reduce property taxes and provide benefit to estate (.50); Review and analyze claims register (.30); Draft written correspondence to Richard A. Marshack re: same (.10);	.90	650.00	585.00
<b>Sub-Total Fees:</b>			<b>111.70</b>		<b>\$ 45,552.00</b>

10 Litigation

Date	Atty	Description	Hours	Rate	Amount
6/14/21	DAW	Conference with U.S. Trustee, Trustee, and Pam Kraus re: background information on Northern Holding LLC;	1.30	490.00	637.00
6/15/21	DAW	Multiple conference calls with Trustee, Matthew Resnick, and Lee Codding;	1.80	490.00	882.00
6/15/21	DAW	Conference with Hilco and Trustee re: marketing efforts;	.80	490.00	392.00
6/15/21	DAW	Conference with Trustee and Reed Waddell counsel for Farm West;	.50	490.00	245.00
6/15/21	DAW	Conference with Trustee, Pam Kraus, Lori Ensley and Matt Resnick Debtor's former counsel re: Debtor's assets and liabilities and understanding between Northern Holding and Rabbit Ridge;	1.20	490.00	588.00
6/16/21	CVH	Conference and e-mails with Richard A. Marshack re: new appointment (.10); Review property brochure (.10); (No Charge)	.20	490.00	N/C
6/16/21	DAW	Multiple conferences with Paul Buie of Onyx Asset Advisors re: asset analysis for the properties;	.50	490.00	245.00
6/16/21	DAW	Conference with Michael Gomez counsel for Farm West re: insight visit and strategy moving forward;	.50	490.00	245.00
6/16/21	DAW	Travel to and tour the Rabbit Ridge winery, Texas Road Property, San Marcos Property, and Live Oak Property with Lee Codding (Marshack - Northern Holding; bill 50% of time to attorney file, the other 50% to Trustee time);	3.30	490.00	1,617.00
6/18/21	DAW	Draft, send, and respond to multiple e-mail correspondence from Trustee, Matt Resnick, and Lee Codding re: conference call re: insurance and lease issues;	.20	490.00	98.00

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Date	Atty	Description	Hours	Rate	Amount
6/18/21	TM	Telephone conference with David A. Wood re: research project and research re: case authority for violation of automatic stay for insurance policy cancellation, written correspondence to David A. Wood re: summary and citation of same;	.60	350.00	210.00
6/19/21	DAW	Review and respond to multiple e-mail correspondence from Pam Kraus and Trustee re: edits to lengthy correspondence to various insurance companies re: violation of automatic stay to cancel policies post-petition without Bankruptcy Court approval;	.30	490.00	147.00
6/19/21	DAW	Draft and send lengthy draft e-mail correspondences to Trustee, Pam Kraus and Kristine A. Thagard re: notice of bankruptcy stay and warning of violation of automatic stay if policies are cancelled;	.50	490.00	245.00
6/21/21	DAW	Multiple conferences with Trustee, Lee Coddington, and Pam Kraus re: insurance issues and lease termination issues;	1.20	490.00	588.00
6/21/21	TM	Telephone conference with David A. Wood re: confirming continuing validity of Ninth Circuit authorities on insurance policies and further research re: validity of cases cited;	.70	350.00	245.00
6/22/21	TM	Multiple telephone conferences with Pam Kraus, Layla Buchanan, and David A. Wood re: case summary and strategy, review schedules and outstanding pleadings, multiple written correspondences with same re: outstanding issues;	1.40	350.00	490.00
6/28/21	DAW	Draft and revise proposed carve out agreement with Farm West;	1.20	490.00	588.00
6/28/21	DAW	Multiple conferences with Trustee re: subordination agreement and strategy moving forward;	.80	490.00	392.00
6/29/21	DAW	Continue to review and revise subordination agreement pursuant to request of the Trustee;	.50	490.00	245.00
7/01/21	DAW	Review and respond to further e-mail correspondence from Reed Waddell and Trustee re: insurance and marketing purposes;	.10	490.00	49.00
7/06/21	DAW	Review and respond to multiple e-mail correspondence from Paul Ready counsel for broker re: bounced check and potential claim by broker (.20); Conference with Paul Ready re: same (.10);	.30	490.00	147.00
7/09/21	DAW	Review and revise emergency motion pursuant to comments and revisions by Trustee and Reed Waddell;	.50	490.00	245.00
7/12/21	DAW	Review and respond to multiple e-mail correspondence from Trustee and Reed Waddell counsel for Farm Credit West re: follow-up on comments and revisions to the carve out agreement, budget, and motion to approve turnover;	.20	490.00	98.00
7/15/21	TM	Telephone conference with Reed Waddell re: secured creditor's position and requests;	.70	350.00	245.00



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Richard Marshack, Trustee  
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Date	Atty	Description	Hours	Rate	Amount
7/16/21	DEH	Meeting with Reed Waddell and Richard A. Marshack and re: motion or lease;	.50	650.00	325.00
7/19/21	TM	Telephone conference with David A. Wood re: negotiations with premium finance company and written correspondence to Richard A. Marshack re: possible opposition to broker employment;	.20	350.00	70.00
7/27/21	TM	Telephone conference with Reed Waddell re: settlement and collateral negotiations, continuance of stay relief, proposed timeline for closing sale and obtaining turnover;	.50	350.00	175.00
7/28/21	CVH	Conference with Trustee re: case status and strategy (.20) (No Charge);	.20	490.00	N/C
8/04/21	TM	Written correspondence with Reed Waddell re: response to creditor's questions on case administration and strategy moving forward;	.10	350.00	35.00
8/05/21	TM	Telephone conference with Reed Waddell re: negotiations with secured creditor and written correspondence to Reed Waddell and Michael Gomez re: signed farm operator agreement and turnover stipulation;	.40	350.00	140.00
8/10/21	DAW	Review and analyze multiple e-mail correspondence from Matt Resnick and Michael Gomez re: inability to serve the Russell's with the deposition notice and thus continuance of the upcoming deposition;	.20	490.00	98.00
8/12/21	TM	Telephone conference with Reed Waddell re: concerns from Farm Credit, case status, timeline for sale, discussion of farm operator motion and turnover response from Russell;	.90	350.00	315.00
8/16/21	DEH	Written correspondence with David A. Wood and Richard A. Marshack re: responses to arguments against sale and benefits conferred by proposed agreement;	.30	650.00	195.00
8/23/21	TM	Telephone conference with Reed Waddell re: settlement negotiations and stipulated terms to propose to clients;	.50	350.00	175.00
8/23/21	TM	Draft and revise three stipulations to resolve Farm Credit objections and for relief from the automatic stay, written correspondence to Reed Waddell re: same;	2.90	350.00	1,015.00
8/24/21	TM	Telephone conference with Reed Waddell re: continuing settlement negotiations, securing San Marcos property, inventory, posture from secured creditor;	.50	350.00	175.00
8/26/21	TM	Telephone conference with Reed Waddell re: status of stipulated resolutions of pending motions;	.10	350.00	35.00
8/27/21	TM	Revise stipulations for resolution of objections and written correspondence to Reed Waddell re: same;	.30	350.00	105.00



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Richard Marshack, Trustee  
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Date	Atty	Description	Hours	Rate	Amount
8/30/21	DAW	Conference with Tinho Mang re: hearing strategy today and potential sale of assets to San Antonio Winery (No Charge);	.30	490.00	N/C
9/01/21	CVH	Conference with Tinho Mang re: hearing results (.10) (No Charge);	.10	490.00	N/C
9/01/21	TM	Draft and revise four orders on hearings Monday including operate order, turnover order, stay relief order, and broker employment order based on stipulations and resolution at hearing, telephone conference with Pam Kraus re: operate order;	1.40	350.00	490.00
10/07/21	TM	Written correspondence with Richard A. Marshack re: drafting stipulation for voluntary subordination of FCW lien and draft stipulation accordingly;	.80	350.00	280.00
10/07/21	TM	Telephone conference with Richard A. Marshack re: review and revision of carve-out stipulation;	.50	350.00	175.00
10/08/21	TM	Telephone conference with Richard A. Marshack re: further revisions to subordination stipulation, review handwritten revisions and incorporate;	.30	350.00	105.00
10/11/21	TM	Written correspondence with Kristine A. Thagard re: proposed revision to carve out stipulation to clarify taxes, revise accordingly;	.20	350.00	70.00
10/18/21	TM	Telephone conference with Reed Waddell re: status of collateral liquidation, bid procedures hearing, grape sales;	.50	350.00	175.00
10/20/21	TM	Review detailed comments from Reed Waddell re: subordination stipulation and written correspondence with Reed Waddell re: clarifications;	.60	350.00	210.00
10/21/21	TM	Telephone conference with Richard A. Marshack re: counteroffer for subordination stipulation;	.10	350.00	35.00
10/26/21	TM	Review Reed Waddell detailed comments to subordination stipulation, revise same, draft detailed point-by-point response;	.80	350.00	280.00
10/29/21	TM	Telephone conference with Richard A. Marshack re: revisions to subordination stipulation with FCW and revise same, written correspondence to Reed Waddell, Michael Gomez re: same;	.60	350.00	210.00
11/02/21	TM	Review and incorporate lengthy comments from Reed Waddell on latest version of subordination stipulation and written correspondence with Reed Waddell re: same;	.70	350.00	245.00
11/03/21	TM	Further written correspondence with Reed Waddell re: fresh round of comments on subordination stipulation;	.30	350.00	105.00
11/03/21	TM	Written correspondence with Reed Waddell re: further comments on subordination stipulation;	.30	350.00	105.00

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Date	Atty	Description	Hours	Rate	Amount
11/08/21	TM	Telephone conference with Reed Waddell re: negotiations with secured creditor on sale of all three properties and payment of ongoing maintenance costs, extension of drop-dead deadline;	.50	350.00	175.00
11/10/21	TM	Written correspondence with Reed Waddell re: further negotiations with bank to extend drop-dead timeline;	.10	350.00	35.00
11/11/21	TM	Multiple telephone conferences with Richard A. Marshack and Reed Waddell (.60) and Richard A. Marshack and Kevin Otus re: negotiations with bank and sale/property administration concerns (.40);	1.00	350.00	350.00
11/11/21	TM	Written correspondence to Reed Waddell re: recap of phone call and distillation of outstanding issues;	.30	350.00	105.00
11/12/21	TM	Telephone conference with Richard A. Marshack re: discussion of revised terms for subordination stipulation (.40); Revise and supplement subordination stipulation (.50);	.90	350.00	315.00
11/15/21	TM	Written correspondence with Richard A. Marshack re: proposed revisions to subordination stipulation;	.30	350.00	105.00
11/15/21	TM	Telephone conference with Richard A. Marshack re: revisions to subordination agreement (.20); Revise agreement accordingly and written correspondence to Richard A. Marshack re: recommendation and advice (.30);	.50	350.00	175.00
11/16/21	CVH	Conferences with Tinho Mang and Trustee re: pending litigation and related deadlines (.20) (No Charge);	.20	490.00	N/C
11/18/21	TM	Review and incorporate Richard A. Marshack revisions to subordination stipulation, telephone conference with Richard A. Marshack and Lori Ensley re: asset disposition issues;	.70	350.00	245.00
11/19/21	TM	Review and further supplement Richard A. Marshack revisions to stipulation for voluntary subordination, written correspondence to Richard A. Marshack re: request for approval;	.50	350.00	175.00
11/22/21	TM	Written correspondence with Reed Waddell re: revised subordination stipulation;	.10	350.00	35.00
11/23/21	TM	Telephone conference with Michael Gomez re: security issues and discussion of subordination stipulation terms;	.30	350.00	105.00
11/24/21	TM	Review written correspondences between Richard A. Marshack and Reed Waddell re: offer from Lee Codding for remainder properties;	.20	350.00	70.00
11/24/21	TM	Telephone conference with Reed Waddell re: negotiations with Farm Credit and security issues;	.40	350.00	140.00
11/29/21	TM	Review revised subordination stipulation from Reed Waddell and written correspondence with Reed Waddell re: same;	.20	350.00	70.00

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Date	Atty	Description	Hours	Rate	Amount
11/29/21	TM	Telephone conference with Richard A. Marshack re: review and discussion of most recent Farm Credit revisions to subordination stipulation, written correspondence to Reed Waddell re: same;	.70	350.00	245.00
11/30/21	TM	Telephone conference with Reed Waddell and Michael Gomez re: discussion and negotiation of subordination stipulation;	.80	350.00	280.00
11/30/21	TM	Review and annotate attorney bill for negotiations with secured creditor (No Charge);	.70	350.00	N/C
12/01/21	TM	Telephone conference with Reed Waddell and Michael Gomez re: negotiations with bank and subordination stipulation, turnover of properties, surcharge, strategy for monetizing and preserving assets;	.80	350.00	280.00
12/01/21	TM	Telephone conference with Richard A. Marshack and Michael Gomez re: negotiations with secured creditor re: management, turnover, and subordination;	.50	350.00	175.00
12/01/21	TM	Supplement and revise subordination stipulation based on lengthy negotiations today, draft exhibits in support;	1.20	350.00	420.00
12/02/21	TM	Written correspondence with Reed Waddell re: effective date of surcharge and claim waivers;	.10	350.00	35.00
12/03/21	TM	Multiple telephone conferences with Richard A. Marshack and Kevin Otus re: negotiation of subordination stipulation and property management issues, written correspondence to Michael Gomez and Reed Waddell re: same;	.40	350.00	140.00
12/03/21	TM	Telephone conference with Richard A. Marshack re: discussion of negotiations with Farm Credit West and delivery of possession to creditor;	.50	350.00	175.00
12/03/21	TM	Revise and incorporate revisions from Richard A. Marshack and FCW counsel to further version of subordination stipulation, written correspondence with FCW counsel re: clarification of issues;	.90	350.00	315.00
12/03/21	TM	Telephone conference with Michael Gomez re: settlement negotiations;	.30	350.00	105.00
12/03/21	TM	Further revise subordination stipulation to incorporate today's settlement negotiations and conform FCW revisions;	1.50	350.00	525.00
12/03/21	TM	Telephone conference with Michael Gomez and Reed Waddell re: settlement negotiations;	.60	350.00	210.00
12/06/21	LB	Conference with Tinho Mang re: preparation of motion to approve carve-out agreement;	.10	260.00	26.00
12/06/21	TM	Telephone conference with Reed Waddell re: brief discussion of revisions to subordination agreement;	.10	350.00	35.00

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Date	Atty	Description	Hours	Rate	Amount
12/06/21	TM	Further revise subordination stipulation and telephone conference with Richard A. Marshack re: same;	.80	350.00	280.00
12/06/21	TM	Telephone conference with Reed Waddell re: further comments on subordination stipulation and negotiation of waivers, etc;	.50	350.00	175.00
12/06/21	TM	Review and compare draft proposed stay relief order with motion and written correspondence with Michael Gomez re: same;	.30	350.00	105.00
12/06/21	TM	Telephone conference with Richard A. Marshack re: discussion of turnover issues, [REDACTED], subordination stipulation, issues with drilling company;	.70	350.00	245.00
12/06/21	TM	Telephone conference with Richard A. Marshack and Reed Waddell re: turnover and discussion of possessory issues;	.70	350.00	245.00
12/06/21	TM	Telephone conference with Richard A. Marshack re: review and revision of letter agreement, discussion of issues, written correspondence to Reed Waddell and Michael Gomez re: final version;	.60	350.00	210.00
12/07/21	CVH	Conference with Tinho Mang re: status of carve-out (.20);	.20	490.00	98.00
12/07/21	DAW	Conference with Trustee re: ongoing negotiations with bank (No Charge);	.40	490.00	N/C
12/07/21	TM	Review demand correspondence from Farm Credit West and written correspondence with Michael Gomez re: clarifications on demands;	.50	350.00	175.00
12/07/21	TM	Telephone conference with Lori Ensley re: discussion of demand for audit and accounting by Farm Credit;	.30	350.00	105.00
12/07/21	TM	Multiple telephone conferences with Richard A. Marshack and Michael Gomez re: negotiations with bank and responses to demands;	.70	350.00	245.00
12/07/21	TM	Telephone conference with Michael Gomez re: discussion of demands and structure of response;	.90	350.00	315.00
12/07/21	TM	Draft detailed response to Michael Gomez re: response to demands;	.90	350.00	315.00
12/08/21	DEH	Telephone conference with Richard A. Marshack re: unauthorized removal of grapes;	.20	650.00	130.00
12/08/21	TM	Telephone conference with Richard A. Marshack, Lori Ensley, and Don Brady re: discussion of facts from diverted truck of grapes in favor of Brady Vineyards;	.60	350.00	210.00
12/08/21	TM	Review multiple written correspondences from Don Brady re: documentary support for diverted grape load;	.40	350.00	140.00
12/09/21	LB	Conference with Tinho Mang re: hearing on motion to extend deadline to assume/reject contracts (.10); Preparation of materials for hearing (.10); Draft proposed order on motion (.20);	.40	260.00	104.00

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Richard Marshack, Trustee  
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Date	Atty	Description	Hours	Rate	Amount
12/10/21	TM	Telephone conference with Reed Waddell re: turnover of access and signature on stipulation for subordination;	.50	350.00	175.00
12/10/21	TM	Telephone conference with Richard A. Marshack re: subordination stipulation;	.20	350.00	70.00
12/10/21	TM	Telephone conference with Richard A. Marshack re: revisions to letter agreement and telephone conference with Richard A. Marshack and Lori Ensley re: discussion of grape harvest accounting and audit;	.40	350.00	140.00
12/13/21	TM	Telephone conference with Reed Waddell re: revisions to possession letter, settlement negotiations re: negotiating taxes, revise letter;	.50	350.00	175.00
12/13/21	TM	Telephone conference with Pam Kraus and Richard A. Marshack re: discussion of article by Perdue;	.20	350.00	70.00
12/14/21	DEH	Telephone conference with Richard A. Marshack re: subpoena;	.20	650.00	130.00
12/14/21	LB	Conference with Tinh Mang re: order approving motion to extend deadline re: contracts (.10); Review and finalize same (.10);	.20	260.00	52.00
12/14/21	TM	Telephone conference with Richard A. Marshack re: status of letter agreement;	.10	350.00	35.00
12/14/21	TM	Written correspondence with Reed Waddell re: request for redlined version of letter agreement;	.20	350.00	70.00
12/14/21	TM	Telephone conference with Michael Gomez re: any outstanding items between trustee and bank;	.10	350.00	35.00
12/15/21	TM	Review demand letter from Tim Lambirth re: allegations of unlawful possession from Rabbit Ridge and written correspondence to Tim Lambirth memorializing same;	.60	350.00	210.00
12/15/21	TM	Telephone conference with Reed Waddell and Michael Gomez re: demand letter from Rabbit Ridge attorney and response;	.30	350.00	105.00
12/16/21	TM	Written correspondence with Tim Lambirth re: reimbursement payments for Rabbit Ridge and/or Lee Codding;	.20	350.00	70.00
12/16/21	TM	Telephone conference with Richard A. Marshack and Lori Ensley re: misappropriation of grape proceeds and diversion of crops (.60); Telephone conference with Richard A. Marshack, Lori Ensley, and Lee Codding re: same and demand for full accounting (.40);	1.00	350.00	350.00
12/16/21	TM	Draft and research motion to approve settlement and subordination agreement;	5.20	350.00	1,820.00
12/17/21	TM	Written correspondence with Michael Gomez re: unauthorized UCC-1 filings and forward same to Lori Ensley;	.20	350.00	70.00
12/17/21	TM	Review checks from unknown grape purchasers received from Lee Codding;	.20	350.00	70.00

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Date	Atty	Description	Hours	Rate	Amount
12/20/21	LB	Conference with Tinho Mang re: research corporate entities related to LeRoy Coddington and Steven Jones (.10); Research re: same (.30);	.40	260.00	104.00
12/20/21	TM	Telephone conference with Richard A. Marshack and Lori Ensley re: review of memorandum of understanding, discussion of accounting issues;	.60	350.00	210.00
12/20/21	TM	Review and incorporate Kristine A. Thagard revisions to motion and written correspondence to Richard A. Marshack re: same;	.40	350.00	140.00
12/20/21	TM	Telephone conference with Richard A. Marshack and Reed Waddell re: discussion of outstanding issues including access and maintenance issues, possible theft of proceeds and estate property;	.70	350.00	245.00
12/20/21	TM	Draft and revise notice of motion to approve subordination agreement;	.10	350.00	35.00
12/22/21	TM	Written correspondence with Tim Lambirth and Lee Coddington re: withdrawal of counsel;	.10	350.00	35.00
1/06/22	TM	Review tentative ruling for Monday's hearing on compromise motion and written correspondence with Richard A. Marshack and Kristine A. Thagard re: same;	.10	350.00	35.00
1/10/22	LB	Conference with Tinho Mang re: preparation of order re: hearing on motion to approve compromise with Farm Credit (.10); Review case file (.10); Draft proposed order (.20);	.40	260.00	104.00
1/10/22	LB	Review and finalize order on motion approving compromise with Farm Credit;	.10	260.00	26.00
1/10/22	TM	Preparation for and attendance at hearing on approval of compromise, telephone conference with Kristine A. Thagard and Richard A. Marshack re: timing of sale motion;	.90	350.00	315.00
1/10/22	TM	Draft and revise order granting motion to approve compromise;	.10	350.00	35.00
1/10/22	TM	Draft stipulation for tax issues;	.60	350.00	210.00
1/11/22	LB	Review response from title company re: request for revised title report;	.10	260.00	26.00
1/14/22	KAT	Review motion/order with Farm Credit re: property taxes (.20);	.20	550.00	110.00
1/14/22	TM	Review entered order approving compromise and partial subordination of lien;	.10	350.00	35.00
1/21/22	KAT	Review and analyze E-mail correspondence with Michael Gomez and Tinho Mang re: potential property tax litigation and review proposed stipulation (multiple) (.30);	.30	550.00	165.00
1/24/22	LB	Conference with Tinho Mang re: preparation of stipulation for tax issues (.10); Review case file (.10); Draft proposed order on stipulation (.20);	.40	260.00	104.00

MARSHACK HAYS LLP

Richard Marshack, Trustee  
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Date	Atty	Description	Hours	Rate	Amount
1/24/22	KAT	Review proposed revisions to stipulation re: San Marcos property taxes and potential recovery and e-mail correspondence with Kevin Ralph and Tinho Mang re: same (multiple) (.30);	.30	550.00	165.00
1/24/22	TM	Telephone conference with Richard A. Marshack re: approval of tax issues stipulation;	.10	350.00	35.00
1/25/22	KAT	E-mail correspondence from Nick Elliot re: grape sales (.10); E-mail correspondence with Nick Elliot and Tinho Mang re: claims (.20);	.30	550.00	165.00
1/27/22	TM	Telephone conference with Michael Gomez re: comments on farm management agreement with Alegre, discussion of nonconsent to payment of Chapter 11 professionals claims;	.20	350.00	70.00
1/27/22	TM	Telephone conference with Richard A. Marshack and Pam Kraus re: collections issues, litigation against operator, approval of farm management arrangement;	1.30	350.00	455.00
1/31/22	LB	Conference with Tinho Mang re: stipulation with Farm Credit re: subordination (.10); Review and finalize stipulation (.10); Review and finalize proposed order re: same (.10);	.30	260.00	78.00
1/31/22	TM	Draft and revise order approving tax issues stipulation;	.20	350.00	70.00
2/01/22	TM	Telephone conference with Richard A. Marshack and Pam Kraus re: next steps on litigation and collection actions against Rabbit Ridge and Lee Codding;	.50	350.00	175.00
2/01/22	TM	Preparation for and attendance at voluntary examination of LeRoy Codding;	2.60	350.00	910.00
2/02/22	CM	Review e-mail from and respond to Kristine A. Thagard re: disclosures for production and draft e-mail to Layla Buchanan re: same;	.10	260.00	26.00
2/11/22	TM	Review threatening correspondence from Lee Codding and written correspondence with D. Edward Hays re: same;	.10	350.00	35.00
2/12/22	DEH	Telephone conference with Tinho Mang re disputes with Lee Codding;	.40	650.00	260.00
2/14/22	CM	Review e-mail from and respond to Kristine A. Thagard re: finalizing amendment to purchase agreement;	.10	260.00	26.00
2/14/22	TM	Telephone conference with D. Edward Hays re: threatening correspondence from Lee Codding (No Charge);	.40	350.00	N/C
2/14/22	TM	Telephone conference with Richard A. Marshack re: drafting response letter to demand by Codding;	.10	350.00	35.00
2/15/22	DAW	Conference with Trustee re: ongoing negotiations with bank and the water drilling this week;	.20	490.00	98.00

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Richard Marshack, Trustee  
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Date	Atty	Description	Hours	Rate	Amount
2/15/22	TM	Telephone conference with D. Edward Hays and Richard A. Marshack re: [REDACTED] and response to Lee Codding demand for payment;	.50	350.00	175.00
2/16/22	TM	Review written correspondence between Pam Kraus and Lee Codding re: response to demand for payment;	.10	350.00	35.00
2/16/22	TM	Telephone conference with Richard A. Marshack re: review and response to Lee Codding threat to lien property;	.10	350.00	35.00
2/16/22	TM	Draft response letter to Codding demands for payment;	1.30	350.00	455.00
2/17/22	TM	[REDACTED] [REDACTED] [REDACTED]	.40	350.00	140.00
2/24/22	TM	Multiple telephone conferences with Richard A. Marshack re: revision to response letter to Codding;	.30	350.00	105.00
2/25/22	LB	Review executed disclosures from Chapter 7 trustee (.10); Review correspondence from Kristine A. Thagard to Victor Sahn re: revisions to findings of facts and order approving sale (.10);	.20	260.00	52.00
2/25/22	CVH	Review letter and communications to/from estate's agent (.20); E-mails with the Trustee re: same (.10); (No Charge)	.30	490.00	N/C
2/25/22	DAW	Review and analyze multiple correspondence from Trustee, D. Edward Hays, and Tinho Mang re: threatening calls and texts sent by Lee Codding to the Trustee;	.30	490.00	147.00
2/25/22	TM	Telephone conference with Richard A. Marshack re: review and revision to Codding response letter;	.40	350.00	140.00
2/25/22	TM	Incorporate Richard A. Marshack revisions to response letter to Codding;	.30	350.00	105.00
2/28/22	TM	Review written correspondences from Lee Codding re: personal attacks;	.10	350.00	35.00
3/02/22	TM	Telephone conference with Richard A. Marshack re: preparation of contempt motion;	.20	350.00	70.00
3/02/22	TM	Telephone conference with Michael Gomez re: sale and closing timeline, update on grape collections;	.20	350.00	70.00
3/03/22	DEH	Telephone conference with Richard A. Marshack re: county's agreement to accept reduced interest upon sale and strategy for structuring agreement to ensure that benefit is realized by estate;	.20	650.00	130.00
3/15/22	TM	Telephone conference with Michael Gomez re: outstanding issues after close of Live Oak sale;	.20	350.00	70.00



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Richard Marshack, Trustee  
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Date	Atty	Description	Hours	Rate	Amount
3/16/22	DEH	Written correspondence with Richard A. Marshack and Tinho Mang re: further threats from Codding and litigation strategy (.30); Telephone conference with Richard A. Marshack re: same (.20); Research re: whether Section 502(d) or Section 510 claim for subordination would apply to disallow Codding's remaining alleged admin claim (.40);	.90	650.00	585.00
3/16/22	TM	Review forwarded threatening written correspondence from Lee Codding;	.10	350.00	35.00
3/16/22	TM	Begin draft and research contempt motion against Codding;	2.80	350.00	980.00
3/17/22	TM	Telephone conference with Richard A. Marshack and Lori Ensley re: collections and filing action against Lee Codding;	.20	350.00	70.00
3/18/22	DEH	Telephone conference with Richard A. Marshack re: motions and actions against Lee Codding;	.20	650.00	130.00
3/21/22	DEH	Written correspondence with Richard A. Marshack, Tinho Mang, Rob Goe, and Brandon Iskander re: Lee Codding's retention of counsel (.20); Telephone conference with Richard A. Marshack re: same (.30); Written correspondence with Richard A. Marshack and Tinho Mang re: same (.20);	.70	650.00	455.00
3/21/22	KAT	Telephone conference Tinho Mang re: communications with Erich Russell (.20); Review documents from Erich Russell (.30); Review multiple e-mails between Tinho Mang and Brandon Iskandar (6+) (.20);	.70	550.00	385.00
3/21/22	TM	Telephone conference with Richard A. Marshack re: discussion of litigation strategy and seeking court authority for disbursements, segregation of funds received from grape proceeds and sale proceeds;	.40	350.00	140.00
3/21/22	TM	Written correspondence with Brandon Iskander and telephone conference with Brandon Iskander re: retention of counsel for Codding and brief factual background and production of documents;	.40	350.00	140.00
3/21/22	TM	Review documents from Erich Russell and written correspondence to Richard A. Marshack re: same;	.40	350.00	140.00
3/21/22	TM	Telephone conference with Michael Gomez re: outstanding issues and foreclosure timing, preservation of collateral and possible dispute by Erich Russell;	.30	350.00	105.00
3/21/22	TM	Continue drafting contempt motion;	4.10	350.00	1,435.00
3/22/22	LB	Conference with Tinho Mang re: preparation of order to show cause re: Codding contempt (.10); Review case file (.10); Draft proposed order re: same (.20);	.40	260.00	104.00
3/23/22	CVH	Review correspondence with Lee Codding and e-mails with Trustee re: same (.10) (No Charge);	.10	490.00	N/C

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Richard Marshack, Trustee  
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Date	Atty	Description	Hours	Rate	Amount
3/24/22	DAW	Conference with Trustee re: ongoing strategy;	.20	490.00	98.00
3/24/22	TM	Telephone conference with Richard A. Marshack re: strategy for filing motion for order to show cause, possible reason for discounted grape sale price, litigation strategy with Goe;	.20	350.00	70.00
3/25/22	TM	Finish draft and research motion for order to show cause against Coddling;	4.80	350.00	1,680.00
3/28/22	LB	Review case file (.10); Preparation of evidence in support of motion (.60); Draft table of contents and table of authorities (.40);	1.10	260.00	286.00
3/28/22	TM	Telephone conference with Richard A. Marshack re: accounting issues, discussion of claim for farm labor from Nevarez, revisions to contempt motion;	.60	350.00	210.00
3/28/22	TM	Revise and update order to show cause motion;	1.20	350.00	420.00
3/29/22	LB	Conference with Tinho Mang re: preparation of order to show cause re: contempt of Coddling (.10); Preparation of additional evidence in support of same (.20); Review case file (.10);	.40	260.00	104.00
3/29/22	LB	Review correspondence from Tinho Mang re: finalizing order to show cause motion (.10); Review and revise evidence in support of same (.30);	.40	260.00	104.00
3/29/22	TM	Finish revising and updating contempt motion and written correspondence to Richard A. Marshack and D. Edward Hays re: same;	2.60	350.00	910.00
3/29/22	TM	Telephone conference with review and revision of contempt motion and evidence in support;	1.00	350.00	350.00
3/30/22	DEH	Telephone conference with Richard A. Marshack re: strategy re: order to show cause re: contempt and final revisions;	.30	650.00	195.00
3/30/22	TM	Revise and update motion for contempt per declaration revisions from Richard A. Marshack last night;	.80	350.00	280.00
3/31/22	DEH	Telephone conference with Richard A. Marshack re: issues re: order to show cause re: contempt and strategy re: same;	.20	650.00	130.00
3/31/22	LB	Review and revise motion for issuance of order to show cause re: Lee Coddling (.10); Conference with Tinho Mang re: additional parties (.10);	.20	260.00	52.00
<b>Sub-Total Fees:</b>			<b>112.80</b>		<b>\$ 41,930.00</b>

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Richard Marshack, Trustee  
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11 Meetings of Creditors

Date	Atty	Description	Hours	Rate	Amount
6/30/21	DAW	Begin preparation for 341(a) on July 13, 2021;	.80	490.00	392.00
7/10/21	DAW	Review and analyze U.S. Trustee notes from the 341(a) and IDI in preparation for Tuesday's 341(a) (.90); begin to draft and outline questions for the 341(a) (1.4);	2.30	490.00	1,127.00
7/12/21	DAW	Prepare for and create outline for tomorrow's 341(a);	1.80	490.00	882.00
7/12/21	TM	Review proposed lines of questioning for debtor at 341(a) hearing and written correspondence with David A. Wood re: supplemental questions;	.20	350.00	70.00
7/13/21	DAW	Prepare for and attend over 3.2 hour 341(a) meeting of creditors;	4.30	490.00	2,107.00
7/20/21	TM	Review 341(a) audio for 7/13/21 meeting of creditors (No Charge);	2.80	350.00	N/C
8/02/21	TM	Telephone conference with Russell Stong re: continuance of 341(a) meeting of creditors, continued date, and brief discussion of insurance issues;	.10	350.00	35.00
9/14/21	DAW	Review and respond to e-mail correspondence from Pam Kraus re: upcoming 341(a);	.10	490.00	49.00
1/03/22	DAW	Review and analyze multiple e-mail correspondence from Trustee and Pam Kraus re: whether the 341(a) is moving forward tomorrow or not;	.20	490.00	98.00
2/03/22	TM	Written correspondence with Pam Kraus re: conducting 341(a) meeting (No Charge);	.10	350.00	N/C
2/08/22	TM	Preparation for and attendance at 341(a) meeting of creditors;	4.60	350.00	1,610.00
2/08/22	TM	Telephone conference with Michael Gomez re: sale negotiations and action items from 341(a) meeting of creditors;	.30	350.00	105.00
2/09/22	TM	Telephone conference with Russ Stong re: conclusion of 341(a) meeting and discussion of sale hearing today;	.20	350.00	70.00
2/10/22	LB	Conference with Tinh Mang re: transcription of February 2022 341(a) hearing;	.10	260.00	26.00
2/15/22	LB	Conference with Tinh Mang re: preparation of 341(a) transcripts;	.10	260.00	26.00
<b>Sub-Total Fees:</b>			<b>18.00</b>		<b>\$ 6,597.00</b>

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Richard Marshack, Trustee  
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13 Relief from Stay Proceedings

Date	Atty	Description	Hours	Rate	Amount
6/30/21	DAW	Review and analyze the order entered by the Court granting in part the relief from stay motion for Farm Credit;	.20	490.00	98.00
7/06/21	TM	Telephone conference with Pam Kraus re: stay relief motion for insurance policies and discussion re: scope and extent of insurance;	.40	350.00	140.00
7/06/21	TM	Review and analyze stay relief motion filed for insurance policies, written correspondence to David A. Wood re: same;	.30	350.00	105.00
7/12/21	TM	Review notice of trustee's sale (foreclosure) received in mail for estate property and written correspondence to David A. Wood re: confirming with FCW that no foreclosure will take place;	.10	350.00	35.00
7/19/21	DEH	Telephone conference with Tinho Mang and Richard A. Marshack re: continuance for stay relief motion filed by FCW and draft stipulation re: same written correspondence to Reed Waddell and Michael Gomez re: draft stipulation;	.30	650.00	195.00
7/19/21	CM	Review and analyze e-mail Tinho Mang re: finalizing opposition and stipulation (.10); Revise and finalize chapter 7 trustee's opposition to motion for relief from stay filed by Adler Belmont Group, Inc.; declaration of Richard A. Marshack in support (.50); Prepare evidence in support (.40);	1.00	260.00	260.00
7/19/21	CM	Review and analyze e-mail from Tinho Mang re: finalizing stipulation (.10); Revise and finalize stipulation to modify responsive deadlines for motion for relief from the automatic stay filed by Farm Credit West (.40);	.50	260.00	130.00
7/19/21	CB	Telephone conference with Chanel Mendoza re: stipulation to modify responsive deadlines for FCW stay relief motion (.50); Prepare draft order approving same (.10);	.60	260.00	156.00
7/19/21	DAW	Review and analyze multiple e-mail correspondence from Reed Waddell and Tinho Mang re: negotiations for stipulation to continue relief from stay motion (.20); Review and analyze filed stipulation (.20); (No Charge)	.40	490.00	N/C
7/19/21	DAW	Review and analyze Broker's relief from stay motion (.30); Review and analyze the Trustee's opposition (.50); (No Charge)	.80	490.00	N/C
7/19/21	TM	Telephone conference with D. Edward Hays and Richard A. Marshack re: continuance for stay relief motion filed by FCW and draft stipulation re: same written correspondence to Reed Waddell and Michael Gomez re: draft stipulation;	.30	350.00	105.00
7/19/21	TM	Telephone conference with Richard A. Marshack re: review and approval of declaration in support of opposition brief;	.10	350.00	35.00

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Date	Atty	Description	Hours	Rate	Amount
7/19/21	TM	Draft and research opposition to insurance broker motion for relief from the automatic stay to cancel policies;	4.10	350.00	1,435.00
7/20/21	DEH	Written correspondence with Tinho Mang and Richard A. Marshack re: review analyze stay relief motion filed by Bank Direct, supporting evidence, application for order shortening time;	.40	650.00	260.00
7/20/21	TM	Review and analyze stay relief motion filed by BankDirect, supporting evidence, application for order shortening time, written correspondence to Richard A. Marshack and D. Edward Hays re: same;	.40	350.00	140.00
7/21/21	TM	Review and analyze reply in support of broker's motion for relief from stay (No Charge);	.30	350.00	N/C
7/22/21	DAW	Review and analyze reply by the insurance broker on the relief from stay motion;	.20	490.00	98.00
7/22/21	TM	Telephone conference with Richard A. Marshack and Elissa Miller re: discussion of premium finance issues and possible further issues with insurance coverage;	.40	350.00	140.00
7/26/21	TM	Written correspondence with Richard A. Marshack re: deadline to file opposition to Farm Credit stay relief motion;	.10	350.00	35.00
7/26/21	TM	Telephone conference with Richard A. Marshack re: opposition to relief from stay and request for continuance, written correspondence to Reed Waddell re: request for continuance of hearing;	.20	350.00	70.00
7/27/21	LB	Conference with Tinho Mang re: preparation of stipulation to continue hearing on FCW relief from stay motion (.10); Draft proposed order re: same (.20);	.30	260.00	78.00
7/27/21	DAW	Review and analyze stipulation between Trustee and Farm West to continue the upcoming relief from stay hearing (No Charge);	.20	490.00	N/C
7/27/21	TM	Draft stipulation to continue hearing on Farm Credit West stay relief motion and written correspondence with Reed Waddell re: setting hearing date and client authority;	.40	350.00	140.00
7/27/21	TM	Draft and revise order approving stipulation to continue stay relief hearing;	.10	350.00	35.00
7/30/21	TM	Review tentative ruling on broker motion for relief from the automatic stay and written correspondence to Richard A. Marshack re: same;	.20	350.00	70.00
7/30/21	TM	Review tentative ruling on Farm Credit stay relief motion and written correspondence to Reed Waddell re: same;	.10	350.00	35.00
7/31/21	LB	Conference with Tinho Mang re: hearing on relief from stay motions (.10);	.10	260.00	26.00

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Richard Marshack, Trustee  
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Date	Atty	Description	Hours	Rate	Amount
7/31/21	DAW	Review and respond to multiple e-mail correspondence from Trustee, D. Edward Hays and Tinho Mang re: relief from stay tentative for Monday and opposition to the order shortening time on Thursday;	.20	490.00	98.00
8/02/21	LB	Conference with Tinho Mang re: preparation of order denying Alder's relief from stay motion;	.10	260.00	26.00
8/02/21	LB	Conference with Tinho Mang re: preparation of opposition to relief from stay motion (.10); Review and finalize opposition and declaration of Richard A. Marshack in support (.30); Preparation of evidence in support of declaration (.30);	.70	260.00	182.00
8/02/21	TM	Preparation for and attendance at hearing on Adler Group stay relief motion;	.50	350.00	175.00
8/02/21	TM	Written correspondence to Elissa Miller re: request for stipulated continuance of hearing;	.10	350.00	35.00
8/02/21	TM	Draft and research opposition to stay relief motion filed by BankDirect;	2.20	350.00	770.00
8/03/21	LB	Review case file (.10); Draft order denying Alder Belmont group relief from stay motion (.20);	.30	260.00	78.00
8/03/21	DAW	Review and analyze 10+ e-mail correspondence from Tinho Mang and Elissa Miller re: negotiations on the insurance relief from stay;	.20	490.00	98.00
8/03/21	TM	Review tentative ruling on BankDirect stay relief motion and written correspondence to Richard A. Marshack and Pam Kraus re: same;	.20	350.00	70.00
8/03/21	TM	Written correspondence with Elissa Miller re: offer from BankDirect for one-week extension on cancellation with immediate stipulated stay relief;	.10	350.00	35.00
8/03/21	TM	Draft and revise order denying stay relief to Adler Belmont;	.10	350.00	35.00
8/03/21	TM	Telephone conference with Richard A. Marshack re: stipulated relief from stay to BankDirect;	.10	350.00	35.00
8/03/21	TM	Multiple written correspondences with Elissa Miller re: negotiations for relief from stay with BankDirect and offer for grace period, negotiations;	.20	350.00	70.00
8/04/21	TM	Preparation for and attendance at hearing on stay relief filed by BankDirect;	.80	350.00	280.00
8/04/21	TM	Written correspondence with Elissa Miller re: extent of arrearages for premium financed insurance;	.10	350.00	35.00
8/04/21	TM	Review lodged order re: relief from stay for BankDirect and written correspondence to Richard A. Marshack and Pam Kraus re: same;	.10	350.00	35.00
8/06/21	TM	Review entered stay relief order for premium finance and written correspondence to Richard A. Marshack and Pam Kraus re: same;	.10	350.00	35.00

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Richard Marshack, Trustee  
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Date	Atty	Description	Hours	Rate	Amount
8/06/21	TM	Review entered order denying stay relief to Adler Belmont group;	.10	350.00	35.00
8/09/21	DAW	Review and analyze multiple e-mail correspondence from Terrance Rashford and Tinho Mang re: unfounded concern on the relief from stay for Farm Credit (No Charge);	.20	490.00	N/C
8/20/21	TM	Written correspondence with Elissa D. Miller and Pam Kraus re: expiration of deadline to pay arrearages for insurance;	.10	350.00	35.00
8/26/21	TM	Telephone conference with Reed Waddell and written correspondence with Reed Waddell re: stipulation for relief from stay;	.20	350.00	70.00
8/31/21	LB	Conference with Tinho Mang re: preparation of order on FCW relief from stay motion (.10); Review case file (.10); Draft order on Farm Credit West relief from stay motion (.30);	.50	260.00	130.00
9/01/21	LB	Conference with Tinho Mang re: preparation of motion on Farm Credit's relief from stay motion (.10); Review case file (.10); Draft proposed order re: same (.30);	.50	260.00	130.00
9/02/21	LB	Review and finalize order on FCW relief from stay;	.10	260.00	26.00
9/02/21	TM	Written correspondence with Lowell Bassett and Pam Kraus re: cancellation notice of prior insurance policy by premium finance lender;	.10	350.00	35.00
12/06/21	TM	Written correspondence with Michael Gomez re: stipulation for entry of revised stay relief order and review revised order;	.20	350.00	70.00
<b>Sub-Total Fees:</b>			<b>20.60</b>		<b>\$ 6,444.00</b>

2 Asset Disposition

Date	Atty	Description	Hours	Rate	Amount
6/15/21	DAW	Conference with Trustee and Terry Rochford at Hilco re: status of marketing and possible sale of residence;	.80	490.00	392.00
6/17/21	DAW	Review and analyze multiple documents from Hilco re: a summary of their marketing efforts and their marketing materials;	.70	490.00	343.00
6/21/21	DAW	Review and respond to multiple e-mail correspondence from Hilco re: status of marketing on properties;	.30	490.00	147.00
6/29/21	DAW	Review and analyze proposed term sheet and letter of intent from Lee Codding re: potential offer of properties for \$16 million;	.40	490.00	196.00



MARSHACK HAYS LLP

Richard Marshack, Trustee  
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Date	Atty	Description	Hours	Rate	Amount
6/29/21	DAW	Multiple conferences with David Neale counsel for Buyer re: further extension of deadline to close escrow (.20); Conference with Trustee re: same (.20);	.40	490.00	196.00
6/30/21	DAW	Review and respond to multiple correspondence from Hilco re: update on the marketing and potential stalking horse bidder;	.20	490.00	98.00
7/01/21	DAW	Review and respond to multiple e-mail correspondence from Trustee and Kevin Otus re: ongoing marketing efforts;	.20	490.00	98.00
7/01/21	DAW	Conference with Mike VanderLey at Force 10 Partners re: potential interested parties in the properties (No Charge);	.80	490.00	N/C
7/02/21	DAW	Review and respond to multiple e-mail correspondence from Kevin Otus and Lee Codding re: confirmation of several tours in early July for interested parties;	.30	490.00	147.00
7/05/21	DAW	Multiple conference calls with Richard A. Marshack and Kevin Otus re: marketing and strategy moving forward (.50); Review and analyze multiple e-mail correspondence from Trustee and Kevin re: terms of engagement (.30);	.80	490.00	392.00
7/06/21	DAW	Review and respond to multiple e-mail correspondence from Jeff Azuse, Trustee, and Reed Waddell re: conference call with potential buyer tomorrow;	.20	490.00	98.00
7/07/21	DAW	Conference call with Onyx, Hilco, and Trustee re: ongoing marketing efforts and strategy moving forward;	.50	490.00	245.00
7/07/21	DAW	Conference with Michael Fine interested buyer, Hilco, and Reed Waddell re: negotiating a stalking horse bidder;	.50	490.00	245.00
7/09/21	DAW	Conference with Trustee re: sale negotiations with San Antonio winery for the sale hearing;	.20	490.00	98.00
7/16/21	DAW	Review and analyze multiple e-mail correspondence from Trustee and Steven Ribol re: San Antonio's \$9 million offer for the Live Oak Property (No Charge);	.20	490.00	N/C
7/16/21	DAW	Review and analyze multiple e-mail correspondence from Jeff Azuse and Trustee re: offer from San Antonio winery (.20); Review and analyze proposed waterfall from the Trustee to show the bank the net payment on account of their debt (.20); (No Charge)	.40	490.00	N/C
7/16/21	TM	Telephone conference with Richard A. Marshack and Kevin Otus re: asset preservation and sale and marketing update;	.40	350.00	140.00
7/20/21	TM	Telephone conference with Richard A. Marshack and Kevin Otus re: tentative agreement from Farm Credit on financing terms and distribution from escrow for Live Oak;	.20	350.00	70.00



MARSHACK HAYS LLP

Richard Marshack, Trustee  
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Date	Atty	Description	Hours	Rate	Amount
7/26/21	DAW	Review and analyze 5+ e-mail correspondence from Trustee, Lee Codding, and Kevin Otus re: tour of the facility this week (No Charge);	.20	490.00	N/C
7/28/21	TM	Telephone conference with Richard A. Marshack and Lee Codding re: turnover issues, status of Donati due diligence, discussion of liquidating or otherwise disposing of current inventory;	.60	350.00	210.00
7/28/21	TM	Telephone conference with Richard A. Marshack, Kevin Otus, Jeff Azuse, Kevin Ralph, Reed Waddell, Michael Gomez, and Jacob Bingham re: negotiation for sale process on Live Oak and comprehensive case status update;	1.50	350.00	525.00
7/30/21	KAT	Draft proposed addendum to purchase contract and e-mail correspondence to Richard A. Marshack and Tinho Mang re same (3.80); E-mail correspondence with Tinho Mang re: entities (.10); Research records of secretary of state for information (.20); Telephone conference with Richard A. Marshack re: form RPA and addendums (.20);	4.30	550.00	2,365.00
7/30/21	TM	Written correspondence with Kristine A. Thagard re: revisions to residential purchase agreement for Live Oak;	.10	350.00	35.00
8/02/21	LB	Conference with Kristine A. Thagard re: revisions to PSA addendum (.10); Review case file (.10); Review and revise PSA Addendum re: 2380 Live Oak Road (.30);	.50	260.00	130.00
8/02/21	KAT	Telephone conference with Richard A. Marshack re: sale of property (.20); revise addendum (1.30);	1.50	550.00	825.00
8/03/21	KAT	Telephone conference Richard A. Marshack and Kevin Otus re: addendum to APA (.20); Review and revise addendum (.20); Telephone conference Kevin Otus re: address (.10); Review title report re: address and APN and vesting (.30); E-mail correspondence to Kevin Otus re: addendum (.10);	.90	550.00	495.00
8/05/21	KAT	E-mail correspondence from Adam Zimmerman, Kevin Otus and Anthony Riboli re: offer (multiple 6+) (.30); Preliminary review of preliminary title report (.40);	.70	550.00	385.00
8/05/21	TM	Telephone conference with Richard A. Marshack and Kevin Otus re: status of sale;	.30	350.00	105.00
8/09/21	KAT	E-mail correspondence with Anthony Riboli, Kevin Otus and Richard A. Marshack re: agreement (multiple) (.30);	.30	550.00	165.00
8/09/21	DAW	Conference with Trustee re: status of sale negotiations with San Antonio winery;	.20	490.00	98.00
8/09/21	TM	Written correspondence with Reed Waddell re: sale negotiations and foreclosure by Farm Credit;	.20	350.00	70.00

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Date	Atty	Description	Hours	Rate	Amount
8/09/21	TM	Telephone conference with Richard A. Marshack, Kevin Otus, and Pam Kraus re: status of marketing and concerns with foreclosure scheduled for August 10;	.20	350.00	70.00
8/11/21	KAT	Review PSA in preparation of meeting (.40); Zoom conference with Anthony Riboli, Richard A. Marshack, Paul Buie, Kevin Otus (and more) re: moving forward (.70); Draft Access Agreement (1.80);	2.90	550.00	1,595.00
8/12/21	KAT	Telephone conference with Kevin Otus re: Riboli family (.20); Review and revise access agreement and e-mail correspondence to parties re same (.40);	.60	550.00	330.00
8/16/21	DAW	Conference with Kevin Otus re: ongoing negotiations with San Antonio Winery and status of potential sale;	.30	490.00	147.00
8/19/21	TM	Telephone conference with Kevin Otus re: marketing update, well drilling and permit process, discussion of proposed stipulated terms, possible disqualification of counsel for buyer based on conflict;	.40	350.00	140.00
8/20/21	DAW	Conference with Kevin Otus re: status of sale to San Antonio winery;	.20	490.00	98.00
8/26/21	TM	Draft and research motion to approve well drilling for Live Oak due diligence by Ribolis, telephone conference with Kevin Otus re: memorializing terms for funding and scope of work;	3.80	350.00	1,330.00
8/27/21	TM	Telephone conference with Kevin Otus re: term sheet with Riboli on water well drilling;	.10	350.00	35.00
8/30/21	DAW	Review and analyze multiple e-mail correspondence from Trustee and Kevin Otus re: PSA from San Antonio winery (.20); Review and analyze proposed PSA (.40);	.60	490.00	294.00
8/31/21	KAT	Review (part) draft of proposed purchase agreement (1.70);	1.70	550.00	935.00
8/31/21	TM	Telephone conference with Kristine A. Thagard re: review for PSA and written correspondence to Kristine A. Thagard re: same (No Charge);	.20	350.00	N/C
9/02/21	KAT	Review and analyze title issues (.70); Telephone conference Tinho Mang re: occupancy, lender and entity (.30); Review and analyze issues in Purchase Agreement for discussion with Victor Sahn (.70);	1.70	550.00	935.00
9/02/21	TM	Telephone conference with Kevin Otus re: sale agreement and negotiations with buyer;	.10	350.00	35.00
9/02/21	TM	Draft proposed terms for well drilling and written correspondence with Kevin Otus and Richard A. Marshack re: same;	.40	350.00	140.00

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Date	Atty	Description	Hours	Rate	Amount
9/02/21	TM	Telephone conference with Richard A. Marshack re: discussion of term sheet for well drilling;	.20	350.00	70.00
9/03/21	KAT	Review agreement prepared by Victor Sahn in preparation for Telephone conference and list issues (.40); Telephone conference with Victor Sahn re: agreement (.30); Telephone conference Kevin Otus re: data room and agreement (.20); Review information in data room for agreement (.10); Draft new purchase agreement (7.0);	8.00	550.00	4,400.00
9/06/21	KAT	Draft and revise purchase agreement and exhibits;	2.70	550.00	1,485.00
9/07/21	CM	Review and analyze e-mail from and respond to Kristine A. Thagard re: revisions to purchase agreement (.10); Revise and supplement same (.30);	.40	260.00	104.00
9/07/21	KAT	Draft and revise purchase agreement and exhibits (2.30); analysis of property tax issues, including review for supplemental taxes (.70); Telephone conference with Richard A. Marshack re: outstanding issues for agreement, including Kevin Otus (part) and Lee Codding (part) (.80); E-mail correspondence to Tinho Mang re: commissions (.10);	3.90	550.00	2,145.00
9/08/21	KAT	Draft and revise purchase agreement (2.50);	2.50	550.00	1,375.00
9/08/21	DAW	Conference with Kevin Otus re: ongoing negotiations with prospective buyers;	.10	490.00	49.00
9/09/21	KAT	E-mail correspondence from Victor Sahn re: agreement (.10); Telephone conference with Richard A. Marshack re: deal points (.20); Draft and revise purchase agreement and exhibits (1.20);	1.50	550.00	825.00
9/09/21	KAT	Telephone conference with Richard A. Marshack, Tinho Mang and Kevin Otus re: drilling agreement and purchase agreement (.30); E-mail correspondence to Richard A. Marshack, Tinho Mang and Kevin Otus re: provision of PSA (.10); Notes re: provisions of drilling agreement and revisions to PSA (.10);	.50	550.00	275.00
9/09/21	TM	Written correspondence to Victor Sahn re: admonition from trustee to not delay transaction;	.10	350.00	35.00
9/09/21	TM	Telephone conference with Richard A. Marshack, Kevin Otus, and Kristine A. Thagard re: discussion of sale process, timeline, various issues and monetizing assets, revisions to PSA;	.90	350.00	315.00

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Date	Atty	Description	Hours	Rate	Amount
9/10/21	KAT	Review and analyze e-mail correspondence from Tinho Mang and Richard A. Marshack re: revisions to agreement (multiple 3+) (.20); Review title report and 2020 PSA for personal property transfers (.20); Review and analyze property tax information, supplemental bill and documentary transfer tax (.40); Telephone conference with Kevin Otus re: PSA (.20); Revise PSA (1.30); E-mail correspondence to Richard A. Marshack and Tinho Mang re: revisions (.20);	2.50	550.00	1,375.00
9/10/21	DAW	Conference with Kristine A. Thagard re: PSA negotiations;	.20	490.00	98.00
9/13/21	KAT	E-mail correspondence with Kevin Otus and Victor Sahn re: additional revisions to agreement (.20);	.20	550.00	110.00
9/13/21	KAT	Review and analyze proposed revisions by Victor Sahn, prepare comments and additional revisions for discussion (1.60);	1.60	550.00	880.00
9/13/21	TM	Telephone conference with Kevin Otus and written correspondence with Kevin Otus re: marketing and negotiations;	.10	350.00	35.00
9/13/21	TM	Written correspondence with Kevin Otus re: review and revision on information in sale waterfall;	.10	350.00	35.00
9/14/21	KAT	E-mail correspondence from Kevin Otus re: additional language for PSA and response (.20); E-mail correspondence from Victor Sahn re: timing and prepare E-mail correspondence with response to questions/statements (.50); Analysis of issues for discussion (.30); Telephone conference with Kevin Otus re: carve-out and property taxes (.30); Analysis of supplemental tax issue (.30);	1.60	550.00	880.00
9/14/21	TM	Telephone conference with Richard A. Marshack re: case status and negotiations with buyer;	.10	350.00	35.00
9/15/21	KAT	Review and suggest revisions to Onyx spreadsheet, including analysis of property taxes (.50); Revise PSA per Onyx revisions and additional revisions (.40); E-mail correspondence to Victor Sahn re: revised agreement (.20); Prepare for an Telephone conference with Victor Sahn re: PSA (.70); Prepare summary of outstanding issues (.80);	2.60	550.00	1,430.00
9/15/21	KAT	Telephone conference with Richard A. Marshack, Kevin Otus and Kyle Pesonen re: timing and cost information (.50); Review current cost information (.10);	.60	550.00	330.00
9/15/21	TM	Written correspondence with Kristine A. Thagard re: proposed revision to asset purchase agreement for commission terms;	.20	350.00	70.00

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Date	Atty	Description	Hours	Rate	Amount
9/16/21	KAT	Telephone conference with Kevin Otus re: current deal points (.20); E-mail correspondence to Pam Kraus re: insurance for Live Oak (.10); E-mail correspondence from Pam Kraus re: insurance costs (.10); E-mail correspondence to Kyle Pesonen re: insurance costs (multiple) (.20); Draft and revise purchase agreement (2.80); E-mail correspondence to V. Sahn with major revisions and timing (.30);	3.70	550.00	2,035.00
9/16/21	TM	Meeting via Zoom with Richard A. Marshack, Jeff Azuse, Kevin Otus re: marketing update and negotiation of PSA, discussion of San Marcos property and offers;	.50	350.00	175.00
9/17/21	KAT	Telephone conference with Victor Sahn re: revisions to agreement (.40); Telephone conference with Richard A. Marshack re: revisions and finalization (.30); Revise agreement (.20); Telephone conference with Kevin Otus re: agreement and budget (.20);	1.10	550.00	605.00
9/20/21	KAT	Review and revise agreement in preparation of meeting (1.80); Meeting via Zoom re: agreement and outstanding issues (.70); Telephone conference (multiple) with Kevin Otus re: outstanding issues (.30); Continue to review and revise agreement (1.30); message to Richard A. Marshack re: breakup fee (.10); E-mail correspondence to Victor Sahn re: agreement and revisions (.20); E-mail correspondence from Victor Sahn with list of issues to address (.20); Review relief from stay order language (.10);	4.70	550.00	2,585.00
9/20/21	DAW	Conference with Kristine A. Thagard re: status of PSA negotiations and strategy moving forward;	.30	490.00	147.00
9/21/21	KAT	Telephone conference and e-mail correspondence (5+) with Tinho Mang (multiple) re: operations agreement, turnover of property and lender relief from stay (.40); Review relevant portions of relief from stay order, turnover order and operations agreement (.40); Respond to issues of Buyer/Victor Sahn and revise purchase agreement (1.70); Telephone conference with Richard A. Marshack re: vineyard maintenance issue and revise agreement/correspondence re same (.30); E-mail correspondence to Pam Kraus re: insurance (.10); Telephone conference with Richard A. Marshack and Kevin Otus re: outstanding issues (.30); E-mail correspondence from Victor Sahn with additional revision to agreement, revise as appropriate and respond to 12 points in E-mail (1.20);	4.40	550.00	2,420.00
9/21/21	TM	Telephone conference with Kristine A. Thagard and written correspondence with Kristine A. Thagard re: sale negotiations (No Charge);	.10	350.00	N/C

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Date	Atty	Description	Hours	Rate	Amount
9/22/21	KAT	Review and analyze e-mail correspondence from Victor Sahn re: outstanding issues (.20); Telephone conference with Richard A. Marshack re: response of Victor Sahn (.10); Telephone conference with Kevin Otus re: response of Victor Sahn (.10); Telephone conference with Tinho Mang re: personal property issues, "tenants", and bid procedures motion (.40); Prepare E-mail response to Victor Sahn re: outstanding issues (.20); E-mail correspondence from Victor Sahn re: breakup fee (.10); Telephone conference with Kevin Otus re: breakup fee and moving forward (.20); E-mail correspondence and Telephone conference with Victor Sahn re: remaining issues (.20); E-mail correspondence to Victor Sahn with agreement (.10); Telephone conference with Kevin Otus re: discussion and data room data(.10);	1.70	550.00	935.00
9/22/21	TM	Telephone conference with Kristine A. Thagard re: offer from Coddling and setting bid procedures, status of PSA with Riboli;	.40	350.00	140.00
9/22/21	TM	Review offer from Coddling on San Marcos and Texas Road property and unexecuted, partially completed trust deed, written correspondence with Lee Coddling re: same;	.20	350.00	70.00
9/23/21	KAT	Telephone conference with Kevin Otus re: discussion items and breakup fee (.10); Review and revise PSA in preparation for meeting (.40); Telephone conference with Richard A. Marshack and Kevin Otus re: final agreement (.70); Review and analyze Zenith policy and e-mail correspondence with Pam Kraus and Tinho Mang re same (.30); Revise PSA per conversation with Kevin Otus re: credit and agreement to be back up bidder (.80); E-mail correspondence to Kevin Otus re: data room information (.10); Review information from Kyle Pesonen and revise schedule 3.6 (.30); E-mail correspondence to Kevin Otus re: revisions (.20);	2.90	550.00	1,595.00
9/24/21	DEH	Telephone conference with Richard A. Marshack re: PSA issues and negotiations;	.20	650.00	130.00

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Date	Atty	Description	Hours	Rate	Amount
9/24/21	KAT	Telephone conference with Richard A. Marshack, Kevin Otus and Reed Waddell re: purchase agreement, personal property and bank approval (.70); Revise agreement to add lender approval and e-mail correspondence to Reed Waddell re: same (.40); Telephone conference with Kevin Otus re: outstanding issues re: property and break up fee and review provision of purchase agreement re same (.40); E-mail correspondence to Chanel Mendoza re: purchase agreement (.10); Telephone conference with Anthony Riboli, Kevin Otus and Victor Sahn re: agreement, personal property and bank (.50); Revise agreement per discussion and Victor Sahn comments (.40); Telephone conference with Chanel Mendoza re: final agreement (.30); Telephone conference with Richard A. Marshack re: revisions (.20); Additional revisions per Richard A. Marshack (.20); E-mail correspondence to Victor Sahn re: additional revisions (.20); Telephone conference with Victor Sahn re: additional revisions and provision re: back-up bidder (.20); E-mail correspondence from Victor Sahn re: "execution version" (.10); E-mail correspondence to Chanel Mendoza re: final document (.10);	3.80	550.00	2,090.00
9/27/21	CM	Telephone conference with Kristine A. Thagard re: status of purchase agreement (.10); Revise and supplement same (.60); Draft e-mail to Kristine A. Thagard re: same (.10);	.80	260.00	208.00
9/27/21	KAT	E-mail correspondence with Victor Sahn and Kevin Otus (5+) re: final agreement (.30); Telephone conference with Richard A. Marshack and Kevin Otus re: agreement and bank (.20); Telephone conference with Chanel Mendoza re: execution copy (multiple) (.20); Review execution copy (.30); Telephone conference with Chanel Mendoza re: revisions and data for schedule 3.6 and asterisk on legal (.20); E-mail correspondence to Chanel Mendoza with data for schedule 3.6 (.10); Review "final" agreement and redline (.20); Telephone conference with Chanel Mendoza re: redline (.10); E-mail correspondence to counsel with final documents (.10); correspondence from Victor Sahn re: final agreement (.10); Telephone conference Reed Waddell and Farm Credit representatives, Kevin Otus and Richard A. Marshack (.90); E-mail correspondence from Anthony Riboli re: deposit and e-mail correspondence to Pam Kraus re: same (.20);	2.90	550.00	1,595.00
9/27/21	DAW	Conference with Trustee re: status of sale negotiations;	.40	490.00	196.00
9/28/21	CM	Review and analyze e-mail from Kristine A. Thagard re: fully executed agreement of purchase and sale and escrow instructions (.10); Revise and supplement agreement (.10); Draft e-mail to Kristine A. Thagard and Richard A. Marshack re: missing initials to agreement (.10);	.30	260.00	78.00



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Date	Atty	Description	Hours	Rate	Amount
9/28/21	KAT	Telephone conference with Richard A. Marshack re: transaction and Riboli request for wire instructions (.20); Review and analyze E-mail correspondence with Reed Waddell re: finalizing transaction (multiple) (.20); Telephone conference with Richard A. Marshack re: execution copy of agreement and proceeding forward (.30); Review waterfall and carve-out and e-mail correspondence to Kevin Otus re same (.20); E-mail correspondence with Tinho Mang re: motions (multiple) (.20); Telephone conference with Richard A. Marshack re: escrow and motions (.20); E-mail correspondence to Chanel Mendoza re: agreement (.10); E-mail correspondence to Pam Kraus and accounting re: check (.10);	1.50	550.00	825.00
9/29/21	KAT	Telephone conference with Richard A. Marshack and e-mail correspondence from Kevin Otus re: escrow and title fees (.20); Review information and e-mail correspondence to Kevin Otus (.30); E-mail correspondence from Reed Waddell re: insurance and e-mail correspondence to Pam Kraus re same (.20); E-mail correspondence from Pam Kraus re: Zenith and e-mail correspondence to Richard A. Marshack and Tinho Mang re same (.20); Telephone conference with Richard A. Marshack, Kevin Otus, Antonia (escrow/part) and Blake (title-part) re: carve-out information (.50);	1.40	550.00	770.00
9/29/21	TM	Begin drafting bid procedures motion;	2.60	350.00	910.00
9/30/21	CM	Review and analyze e-mail from and respond to Kristine A. Thagard re: receipt of trustee's initial page 8 to purchase and sale agreement;	.10	260.00	26.00
9/30/21	KAT	Review required disclosures and e-mail correspondence to Kevin Otus re same (.50); E-mail correspondence from Pam Kraus re: Zenith Ins. (.10);	.60	550.00	330.00
10/01/21	LB	Conference with Tinho Mang re: preparation of bid procedure motion (.10); Conference with Court Deputy re: reservation of hearing date (.10);	.20	260.00	52.00
10/01/21	KAT	E-mail correspondence with Tinho Mang re: Bid Procedures motion and review and revise same (.50); E-mail correspondence with Victor Sahn and Tinho Mang re: motion and declaration (.10);	.60	550.00	330.00
10/01/21	TM	Written correspondence with Victor Sahn re: date for filing motion to approve bid procedures and supplement;	.10	350.00	35.00
10/01/21	TM	Finish drafting bid procedures motion;	1.70	350.00	595.00
10/04/21	LB	Conference with Tinho Mang re: preparation of motion to authorizing drilling of wells (.10); Review and finalize motion and evidence in support of declaration of Richard A. Marshack (.80); Draft notice of motion (.30);	1.20	260.00	312.00



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Date	Atty	Description	Hours	Rate	Amount
10/04/21	KAT	E-mail correspondence with Tinho Mang re: overbid (.10); Telephone conference with Richard A. Marshack, Kevin Otus, Kyle Pesonen and Jeff Azure re: bid procedures, sale motion and drilling (.70); Review and analyze PSA and telephone conference with Richard A. Marshack re: PSA and bid procedure approvals (.30); Telephone conference with Tinho Mang re: bid procedures motion and motion to approve drilling (.30); E-mail correspondence to Richard A. Marshack and Kevin Otus re: permits (.10); E-mail correspondence from Kevin Otus re: permits (.10); E-mail correspondence from Richard A. Marshack re: permits (multiple) (.10); E-mail correspondence to Tinho Mang re: final permits (.10); Review added footnote re: due diligence fees and e-mail correspondence with Tinho Mang re same (.20); Review motion to approve drilling and e-mail correspondence with Tinho Mang re same (.50); Review additional proposed changes to bid procedures motion from Tinho Mang and Telephone conference with Tinho Mang re same (.40); E-mail correspondence with Victor Sahn re: motions and title (.20);	3.10	550.00	1,705.00
10/04/21	TM	Review and incorporate Kristine A. Thagard revisions to motion for bid procedures, written correspondence with Kristine A. Thagard re: same;	.20	350.00	70.00
10/04/21	TM	Telephone conference with Kevin Otus and written correspondence with Kevin Otus re: modification to well drilling permit applications;	.20	350.00	70.00
10/04/21	TM	Review declaration from Victor Sahn and telephone conference with Kristine A. Thagard re: review and incorporation of same;	.30	350.00	105.00
10/04/21	TM	Telephone conference with Kristine A. Thagard re: discussing issues with bid procedures motion and motion for well drilling;	.30	350.00	105.00
10/04/21	TM	Further revise bid procedures and well drilling motions to incorporate position of buyer per Riboli declaration;	.30	350.00	105.00
10/04/21	TM	Revise and finalize well drilling motion;	2.70	350.00	945.00
10/04/21	TM	Draft and revise notice of motion to authorize well drilling;	.20	350.00	70.00
10/05/21	LB	Conference with Tinho Mang re: preparation of bid procedure motion (.10); Draft notice of bid procedure motion (.40);	.50	260.00	130.00

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Date	Atty	Description	Hours	Rate	Amount
10/05/21	LB	Conference with Tinho Mang re: preparation of motion to approve bid procedures (.10); Review and finalize same (.40); Conference with Richard A. Marshack re: declaration in support of motion (.10); Draft correspondence to interested parties re: notice of hearing and motion (.20); Draft facsimile correspondence to taxing authorities re: notice of hearing and motion (.20); Conference call with Franchise Tax Board and Internal Revenue Service re: service of motion (.30); Research additional service information for creditors (.20); Review and finalize notice of motion (.20); Instruction to attorney service re: personal service of motion to creditors (.40);	2.10	260.00	546.00
10/05/21	KAT	Review and analyze revised well permits (.10); E-mail correspondence with Anthony Riboli re: final agreement (.20); Review and analyze explanation on pit exploration and e-mail correspondence to Kevin Otus re: insurance (.20); E-mail correspondence with Victor Sahn re: motions (.10); Review and analyze 21/22 taxes (.30); Review title issues from Bruce McBirney correspondence and review Fidelity PTR (.60); Telephone conference with Richard A. Marshack re: opening escrow (.10); E-mail correspondence to Blake Uradomo re: updated PTR (.20); E-mail correspondence to Bruce McBirney re: Fidelity PTR and update (.20); E-mail correspondence to Antonia at escrow re: opening escrow (.20); E-mail correspondence to Kevin Otus re: Natural Hazard Disclosure (.10); E-mail correspondence from Victor Sahn re: declaration of Anthony Riboli, review declaration and e-mail correspondence to Victor re: insurance for pit digging (.40); E-mail correspondence to Victor Sahn re: inaccuracies in Riboli declaration (.30); E-mail correspondence with Victor Sahn re: bid procedures motion (multiple) (.20);	3.20	550.00	1,760.00
10/05/21	DAW	Review and analyze the Trustee's motion for bid procedures and the well motion (No Charge);	1.00	490.00	N/C
10/05/21	TM	Further revise bid procedures motion and written correspondence with trustee and Kristine A. Thagard re: same;	.10	350.00	35.00
10/05/21	TM	Draft and revise notice of bid procedures motion and written correspondence with Layla Buchanan re: service;	.20	350.00	70.00
10/06/21	LB	Conference call with process server re: PG&E service issues for bid procedure motion (.10); Research additional service of process for PG&E (.20); Draft e-mail to Brian Wong of PG&E re: notice and service of bid procedure motion (.10);	.40	260.00	104.00
10/06/21	KAT	E-mail correspondence from Kevin Otus re: timeline, review PSA and provided detailed response (.40); E-mail correspondence from Victor Sahn re: revisions to buyer's declaration (.10); Telephone conference with Bruce McBirney re: updated title report and issues to be addressed (.30);	.80	550.00	440.00

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Date	Atty	Description	Hours	Rate	Amount
10/07/21	KAT	E-mail correspondence with Antonia Delgado re: escrow and deposit (.20);	.20	550.00	110.00
10/08/21	KAT	E-mail correspondence from Victor Sahn re: bid procedures order (.10); E-mail correspondence to Tinho Mang re: order (.10); E-mail correspondence with Layla Buchanan re: hearing on motion (.10);	.30	550.00	165.00
10/08/21	TM	Review Anthony Riboli declaration in support of bid procedures;	.20	350.00	70.00
10/11/21	KAT	E-mail correspondence with Victor Sahn re: bid procedures motion and order (.20); E-mail correspondence with Tinho Mang re: order and review same (.20); Review proposed carve-out stipulation, current property taxes and propose revised language re: taxes (.40); E-mail correspondence with Tinho Mang re: taxes, review revised stipulation and e-mail correspondence to Reed Waddell re: revision (.30);	1.10	550.00	605.00
10/11/21	TM	Draft proposed overbid order and written correspondence with Kristine A. Thagard re: same;	.30	350.00	105.00
10/12/21	KAT	E-mail correspondence from Kevin Otus and Richard A. Marshack (multiple) re: Switzer contract and additional insured endorsements and review and analyze additional insured endorsement (.20); E-mail correspondence to Kevin Otus re: issues with AI (.10);	.30	550.00	165.00
10/12/21	DAW	Conference with Trustee re: San Antonio winery offer and Lori Ensley's inspection of the property this week;	.20	490.00	98.00
10/13/21	KAT	E-mail correspondence from Victor Sahn with tentative ruling and review tentative (.10); Telephone conference with Tinho Mang re: tentative (.20); E-mail correspondence to Victor Sahn re: tentative (.10); Telephone conference with Richard A. Marshack and Kevin Otus (part) re: tentative ruling (.20);	.60	550.00	330.00
10/13/21	DAW	Conference with Trustee re: sale negotiations with San Antonio winery;	.10	490.00	49.00
10/13/21	TM	Review written correspondence from Victor Sahn re: tentative ruling on bid procedures and review tentative ruling;	.10	350.00	35.00
10/13/21	TM	Telephone conference with Reed Waddell re: subordination agreement and bid procedures tentative from the court;	.30	350.00	105.00
10/14/21	TM	Telephone conference with Richard A. Marshack re: discussion of court's tentative ruling;	.10	350.00	35.00
10/14/21	TM	Telephone conference with Kristine A. Thagard re: hearing on Monday and trustee's position, buyer's position, secured creditor's position;	.10	350.00	35.00

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Date	Atty	Description	Hours	Rate	Amount
10/15/21	KAT	E-mail correspondence from Antonia Delgado at AA Escrow re: updated title report and NHD Report (.10); Review updated title report and e-mail correspondence to Blake Uradomo re: elimination of exceptions 14 and 15 (.40); Review NHD report, including information re: High Fire Zone and information re: Cal Fire inspection (.70); Review to Bruce McBirney and Victor Sahn re: updated title report and NHD report (.10); E-mail correspondence to Kevin Otus re: NHD report, additional disclosure and fire inspection (.20); Telephone conference with Richard A. Marshack re: bid procedures and Kevin Otus (part) re: bid procedures, permits and disclosures (.30);	1.80	550.00	990.00
10/18/21	KAT	Prepare outline of arguments for bid procedures hearing (.30); Court Appearance for Bid Procedures Motion (.50); E-mail correspondence with Kevin Otus re: hearing (.10); E-mail correspondence and Telephone conference with Victor Sahn re: order, hearing and fertilizing property by Riboli (.30); Telephone conference with Richard A. Marshack re: fertilizing property (.10); Telephone conference with Tinho Mang re: bid procedures motion hearing and fertilizing (.10);	1.40	550.00	770.00
10/18/21	TM	Telephone conference with Kristine A. Thagard re: bid procedures and maintenance of soil quality by Riboli;	.20	350.00	70.00
10/19/21	KAT	E-mail correspondence with Lee Coddling re: harvest (.10); E-mail correspondence from Victor Sahn re: order and e-mail correspondence to Layla Buchanan re: addition of Reed Waddell (.10); Review and approve revised order on bid procedures (.10); E-mail correspondence to Victor Sahn re: revised order, harvest and amendment to PSA (.20); E-mail correspondence from title re: exceptions (.10); Telephone conference with Nick Quinsy- SLO county counsel re: sale and payment of taxes (.30); Prepare notes re: conversation and e-mail correspondence to Kevin Otus re: the sale of Texas Road and San Marcos (.30);	1.20	550.00	660.00
10/20/21	DAW	Review and analyze order entered by Court granting bid procedures;	.10	490.00	49.00
10/21/21	LB	Review and revise amendment to Purchase and Sale Agreement;	.20	260.00	52.00
10/21/21	LB	Conference with Kristine A. Thagard re: motion on hearing for well drilling (.10); Review case file (.10); Preparation of materials for hearing (.10);	.30	260.00	78.00
10/21/21	KAT	Draft Amendment to PSA (.90); Analysis of section numbering issue (.20); Review and analyze permits and issue with litigation reference (.20); E-mail correspondence to Victor Sahn re: permits and amendment (.20);	1.50	550.00	825.00
10/21/21	TM	Review issued well permits and written correspondence to Kristine A. Thagard re: same;	.10	350.00	35.00

MARSHACK HAYS LLP

Richard Marshack, Trustee  
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Date	Atty	Description	Hours	Rate	Amount
10/22/21	KAT	E-mail correspondence with Victor Sahn re: drilling contract (.20); Telephone conference with Tinho Mang re: drilling contract and amendment (.20); Analysis of section headings and references in Article III of PSA and revise amendment to re-reference (1.50); Telephone conference with Victor Sahn re: amendment and drilling contract (.20);	2.10	550.00	1,155.00
10/22/21	TM	Telephone conference with Kristine A. Thagard re: water well contract and Monday's hearing, revisions to PSA;	.20	350.00	70.00
10/25/21	LB	Draft proposed order granting motion to approve drilling of well (.30);	.30	260.00	78.00
10/25/21	KAT	Prepare for and attend hearing on motion for approval of well drilling (.60); Review and revise order (.20);	.80	550.00	440.00
10/26/21	KAT	E-mail correspondence with Tinho Mang re: amendment (.10); Revise language and e-mail correspondence to Tinho Mang re same (.20);	.30	550.00	165.00
10/26/21	TM	Review proposed one-page amendment to PSA and written correspondence to Kristine A. Thagard re: comments on same;	.10	350.00	35.00
10/27/21	KAT	E-mail correspondence to Victor Sahn with explanation of amendment and renumbering issues (.40); E-mail correspondence to Layla Buchanan re: drilling order (.10);	.50	550.00	275.00
10/29/21	KAT	E-mail correspondence with Richard A. Marshack and Kevin Otus (multiple 8+) re: drilling order, Miller drilling and insurance (.20); Telephone conference with Richard A. Marshack and Tinho Mang re: First Amendment (.20); E-mail correspondence with Richard A. Marshack and Tinho Mang re: carve-out (4+) (.10); E-mail correspondence with Victor Sahn re: First Amendment (.10); E-mail correspondence from Anthony Riboli re: insurance and e-mail correspondence to Kevin Otus re: same (.10);	.70	550.00	385.00
10/29/21	DAW	Review and analyze multiple e-mail correspondence from Trustee and Onyx re: status of the drilling (No Charge);	.20	490.00	N/C
10/29/21	TM	Telephone conference with Kristine A. Thagard and Richard A. Marshack re: amendments to purchase and sale agreement;	.10	350.00	35.00
10/31/21	KAT	E-mail correspondence from Kevin Otus re: Russell's and e-mail correspondence to Richard A. Marshack and Kevin Otus re: title issue and affidavit (.20);	.20	550.00	110.00
11/01/21	KAT	Review changes made by court to entered drilling order (.10); E-mail correspondence to Kevin Otus re: entered order and need for advance funding (.10);	.20	550.00	110.00

MARSHACK HAYS LLP

Richard Marshack, Trustee  
Client-Matter# 1015-146

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Date	Atty	Description	Hours	Rate	Amount
11/02/21	TM	Telephone conference with Richard A. Marshack and Kevin Otus re: sale strategy for other properties, carve out agreement with FCW for Live Oak and revisions to same;	.80	350.00	280.00
11/03/21	KAT	E-mail correspondence to Layla Buchanan re: Sale Motion (.10); E-mail correspondence to Layla Buchanan re: insurance certificates (.10); E-mail correspondence to Victor Sahn re: Amendment (.20); Telephone conference with Kevin Otus re: drilling delay and redemption issues (.30); E-mail correspondence with Victor Sahn re: Amendment (.20);	.90	550.00	495.00
11/04/21	KAT	Telephone conference with Kevin Otus re: land maintenance and first amendment (.20);	.20	550.00	110.00
11/04/21	TM	Telephone conference with Kevin Otus re: negotiations with bank and impact of unanticipated delay in well drilling timeline;	.20	350.00	70.00
11/05/21	KAT	Revise first amendment (.20); E-mail correspondence to Victor Sahn re: revised first amendment (.20); E-mail correspondence from Victor Sahn with lengthy conditions to move forward (.20); Telephone conference and e-mail correspondence with Tinho Mang re: Riboli conditions to moving forward (.30); E-mail correspondence from Tinho Mang to Reed Waddell (.10); E-mail correspondence from Reed Waddell re: property and extension (.10); Telephone conference with Tinho Mang re: Russell and property taxes on Texas Rd. property (.20); E-mail correspondence to Victor Sahn responding to his concerns (.20);	1.50	550.00	825.00
11/07/21	KAT	E-mail correspondence with Kevin Otus re: disclosures (.10);	.10	550.00	55.00
11/08/21	TM	Telephone conference with Kevin Otus re: timeline for sale and tentative extension of drop-dead deadlines, brief explanation of trustee's avoidance powers for tax penalties;	.20	350.00	70.00
11/09/21	TM	Telephone conference with Richard A. Marshack re: sale negotiations;	.10	350.00	35.00
11/10/21	KAT	E-mail correspondence to Victor Sahn re: drilling and current timing (.10);	.10	550.00	55.00
11/11/21	KAT	Telephone conference with Richard A. Marshack and Tinho Mang re: property taxes (.10);	.10	550.00	55.00
11/11/21	TM	Telephone conference with Richard A. Marshack and David A. Wood re: sale status and outstanding negotiations with secured creditor;	.20	350.00	70.00
11/12/21	LB	Conference with Tinho Mang re: preparation of sale motion and research re: liens and encumbrances (.10); Conference with Kathleen Frederick re: same (.10);	.20	260.00	52.00



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Date	Atty	Description	Hours	Rate	Amount
11/15/21	LB	Conference with Tinho Mang re: preparation of sale motion (.10); Review case file (.30); Draft motion to approve sale (1.8); Draft declarations of Richard A. Marshack, Jeff Azuse, and Kevin Otus (.40); Draft request for judicial notice (.30); Conference call with Kevin Otus re: status of marketing (.10); Correspondence to Kevin Otus and Jeff Azuse re: marketing of Live Oak Property for inclusion in the motion and declarations of Jeff Azuse and Kevin Otus (.20);	3.20	260.00	832.00
11/15/21	KAT	Telephone conference with Richard A. Marshack re: sale of property and drilling (.10); E-mail correspondence to Victor Sahn re: amendment to PSA (.10);	.20	550.00	110.00
11/16/21	KAT	E-mail correspondence with Tinho Mang re: Farm Credit and amendment (multiple) (.20); E-mail correspondence with Victor Sahn re: drilling and amendment (multiple) (.20); Prepare/revise amendment to extend date for motion, including a review of PSA (.60); E-mail correspondence with Kevin Otus re: drilling and dates (.10); Telephone conference with Tinho Mang re: stipulation with FCA (.10); E-mail correspondence from Nick Quincey re: taxes on San Marcos and analysis of taxes (.30);	1.50	550.00	825.00
11/16/21	TM	Telephone conference with Kristine A. Thagard re: status of negotiations with bank and terms for revised PSA;	.20	350.00	70.00
11/17/21	KAT	Review and analyze e-mails (multiple) from Tinho Mang re: property taxes (.20); Telephone conference Tinho Mang re: avoidance of property taxes and strategy to deal with County, and new dates for Live Oak closing (.30); Telephone conference with Kevin Otus re: disclosures for Live Oak and drilling (.20); Revise amendment with dates from Tinho Mang (.20);	.90	550.00	495.00
11/17/21	TM	Further revise subordination stipulation per Richard A. Marshack requested additions and written correspondence to Richard A. Marshack re: same;	.40	350.00	140.00
11/17/21	TM	Telephone conference with Richard A. Marshack and Kevin Otus re: sale negotiations and property control issues;	.20	350.00	70.00
11/17/21	TM	Telephone conference with Pam Kraus re: property security issues and abandonment of personal property interests;	.20	350.00	70.00
11/18/21	TM	Review and compare legal description for property and written correspondence with Kristine A. Thagard re: discrepancy between PSA and approved legal description from bank;	.20	350.00	70.00
11/19/21	KAT	Telephone conference with Richard A. Marshack re: amendment extending dates on sale motion and outside closing (.10);	.10	550.00	55.00
11/22/21	KAT	E-mail correspondence to Victor Sahn re: amendment (.20); E-mail correspondence with Tinho Mang, Richard A. Marshack and Pam Kraus re: property, FCA and sale to Codding (multiple 8+) (.20);	.40	550.00	220.00

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Date	Atty	Description	Hours	Rate	Amount
11/23/21	KAT	E-mail correspondence with Richard A. Marshack, Kevin Otus and Tinho Mang re: sale of Texas Rd. and San Marcos (multiple 7+) (.20); E-mail correspondence to Victor Sahn re: amendment (.10);	.30	550.00	165.00
11/29/21	KAT	E-mail correspondence with Richard A. Marshack and Tinho Mang re: sale delay and sale motion (.10); E-mail correspondence to Victor Sahn re: amendment to purchase agreement (.10); Telephone conference with Kevin Otus re: delay and amendment (.20);	.40	550.00	220.00
12/01/21	KAT	E-mail correspondence to Victor Sahn re: amendment (.10); E-mail correspondence from Kevin Otus re: amendment and prepare response (.10); Review e-mail correspondence from Victor Sahn and review purchase agreement for relevant dates (.50); prepare response to Victor Sahn (.20); Telephone conference with Kevin Otus re: back-up offers (multiple) (.30);	1.20	550.00	660.00
12/01/21	DAW	Conference with Trustee re: status of sale;	.20	490.00	98.00
12/03/21	KAT	E-mail correspondence from Kevin Otus re: sale (.10); E-mail correspondence from Tinho Mang re: back position on maintenance (.10); E-mail correspondence to Victor Sahn re: amendment (.10); Telephone conference with Tinho Mang re: status with bank (.20); Telephone conference with Richard A. Marshack re: back, Lee Coddling and watering issue (.10); Telephone conference with Victor Sahn re: watering issues (.10); Telephone conference with Kevin Otus re: buyers and maintenance (.20); Telephone conference with Tinho Mang re: bank stipulation and Lee Coddling (.20);	1.10	550.00	605.00
12/06/21	KAT	Review offer and e-mail correspondence with Richard A. Marshack and Kevin Otus re same (multiple) (.20); Telephone conference with Kevin Otus re: new offer and issues with Miller Drilling (.30); E-mail correspondence from Tinho Mang re: bank agreement (.10); Review prior draft agreements from exemplar for Kevin Otus (.30); Draft back up agreement (2.80);	3.70	550.00	2,035.00
12/07/21	KAT	Review and revise back-up agreement (1.70); E-mail correspondence to Kevin Otus re: back-up agreement (.10);	1.80	550.00	990.00
12/09/21	KAT	Telephone conference with Tinho Mang re: bank carve-out and Lee Coddling (.20); E-mail correspondence from Kevin Otus re: Lee Coddling (multiple) (.10); E-mail correspondence from Anthony Riboli and Kevin Otus to bank re: irrigation (.10);	.40	550.00	220.00
12/10/21	KAT	Telephone conference with Tinho Mang re: final stipulation (.20); Review relevant portions of stipulation (.20); E-mail correspondence to Victor Sahn re: stipulation (and approval of sale by bank), irrigation and first amendment (.30);	.70	550.00	385.00



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Date	Atty	Description	Hours	Rate	Amount
12/15/21	KAT	E-mail correspondence from Antonia Delgado re: title issues, review report and respond (.40);	.40	550.00	220.00
12/20/21	KAT	E-mail correspondence from Victor Sahn re: amendment and outstanding issues and analysis of same (.20); E-mail correspondence to Tinho Mang re: security and locks at property (.10); Review and revise motion to approve subordination agreement, Telephone conference and e-mail correspondence with Tinho Mang re same (.50); E-mail correspondence from Victor Sahn re: Miller Drilling and prepare detailed response re: advance deposit, access, insurance, and title issues, including a review of title report (.80);	1.60	550.00	880.00
12/20/21	TM	Written correspondence with Kristine A. Thagard re: response to concerns from Riboli's counsel;	.10	350.00	35.00
12/21/21	KAT	Review title issues and transfers (1.30); Conference with Kevin Otus re: disclosures and current sale issues (.20);	1.50	550.00	825.00
12/22/21	KAT	E-mail correspondence with Kevin Otus re: disclosures and agreement (.20);	.20	550.00	110.00
12/30/21	KAT	Review proposed revisions to First Amendment from Victor Sahn and e-mail correspondence to Victor Sahn re same and continuing issues (.50);	.50	550.00	275.00
1/03/22	LB	Conference with Tinho Mang re: preparation of sale motion (.10); Conference with Court Deputy re: Court's calendar (.10);	.20	260.00	52.00
1/03/22	TM	Review written correspondences from Lee Coddling and Michael Gomez re: disposition and maintenance of personal property;	.20	350.00	70.00
1/03/22	TM	Telephone conference with Kevin Otus re: marketing and sale deadlines;	.30	350.00	105.00
1/05/22	KAT	E-mail correspondence from Kevin Otus re: disclosures document and review 7 disclosures attached (.40); E-mail correspondence to Kevin Otus re: missing disclosure statements (.30); Draft disclosure statement for Trustee (1.20); Telephone conference with Richard A. Marshack and Tinho Mang (part) re: property sale, title issues and resolution (.40); Review date and recording issues and e-mail correspondence to title officer re: possible resolution (.50); Review additional disclosures and additional E-mail to Kevin Otus and Hilco re: missing documents (.60); E-mail correspondence to Chanel Mendoza re: disclosure booklet (.10);	3.50	550.00	1,925.00
1/05/22	TM	Telephone conference with Richard A. Marshack and Kristine A. Thagard re: status of sale and title issues (No Charge);	.40	350.00	N/C
1/07/22	LB	Conference with Tinho Mang re: sale hearing (.10); Conference with Court' clerk re: status of case transfer (.10);	.20	260.00	52.00

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Date	Atty	Description	Hours	Rate	Amount
1/07/22	KAT	E-mail correspondence with Jonathan Cuticelli re: escrow (.20); Telephone conference with Tinhon Mang re: hearing and motion issues (.20);	.40	550.00	220.00
1/07/22	TM	Telephone conference with Layla Buchanan and Kristine A. Thagard re: obtaining sale hearing date;	.10	350.00	35.00
1/10/22	LB	Conference with Tinhon Mang re: preparation of sale motion and updated preliminary title report (.10); Correspondence to First American Title re: same (.10);	.20	260.00	52.00
1/10/22	KAT	Telephone conference Bruce McBirney re: title issues (.80); Review updated report (.20); Review and analyze E-mail correspondence to Fidelity from Bruce McBirney with title issues (.30); Telephone conference Tinhon Mang re: title officer (.10); Review petition and underlying documents for correct LLC jurisdiction (.40); E-mail correspondence with Tinhon Mang (multiple) re: correct entity (.20); Review and analyze of E-mail from Bruce McBirney with title issues (.30); Review stipulation re: taxes with Farm Credit Association (.10);	2.40	550.00	1,320.00
1/10/22	TM	Written correspondence with Kristine A. Thagard re: title issues to be resolved for sale;	.10	350.00	35.00
1/11/22	KAT	Review proposed revision to First Amendment by Victor Sahn (.20); Telephone conference Kevin Otus re: drilling and property maintenance (.20); E-mail correspondence to Kevin Otus with maintenance language and request for manager information (.20); Revise amendment to PSA (.50); E-mail correspondence to Victor Sahn re: revisions (.30); E-mail correspondence from Kevin Otus (multiple) re: FCA (.10); Telephone conference with Tinhon Mang re: sale motion (.20); Review e-mail correspondence from Bruce McBirney re: exceptions to title and e-mail correspondence to Tinhon Mang re: issues in FATIC and Fidelity reports to be eliminated (.60);	2.30	550.00	1,265.00
1/11/22	TM	Review written correspondence from Richard A. Marshack to bank re: detailed purchase offers;	.10	350.00	35.00
1/11/22	TM	Telephone conference with Kristine A. Thagard re: sale and title issues;	.20	350.00	70.00
1/12/22	KAT	Review updated preliminary title report (.30); E-mail correspondence to Tinhon Mang re: additional items for sale motion (.20); E-mail correspondence to Bruce McBirney re: updated preliminary title report (.20); E-mail correspondence with Tinhon Mang re: LLC (multiple) and quick review of Minn. Control Agreement (.30);	1.00	550.00	550.00

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Date	Atty	Description	Hours	Rate	Amount
1/13/22	KAT	E-mail correspondence to Bruce McBirney and Victor Sahn re: legal description (.20); E-mail correspondence from Tina Talbot re: disclosures, analyze information and revise disclosure list (.40); E-mail correspondence to Chanel Mendoza re: revisions and booklet (.10);	.70	550.00	385.00
1/14/22	KAT	E-mail correspondence to Kevin Otus re: amendment and land maintenance issue (.20); Telephone call (message) and e-mail to Victor Sahn and Bruce McBirney re: amendment (.30); E-mail correspondence from title with updated prelim and review same (.20); E-mail correspondence from Bruce McBirney re: revised legal description (.10);	.80	550.00	440.00
1/14/22	TM	Draft sale motion for Live Oak;	6.30	350.00	2,205.00
1/17/22	KAT	Review and revise sale motion, including review of claims and documents for support (2.50);	2.50	550.00	1,375.00
1/18/22	LB	Conference with Tinho Mang re: preparation of sale motion (.10); Review and revise motion, declaration of Richard A. Marshack, declaration of Kevin Otis, Declaration of Jeff Azure and draft table of authorities (.70); Review and revise request for judicial notice (.30); Preparation of evidence in support of declaration of Richard A. Marshack and request for judicial notice (.30); Review case file (.20); Draft notice of sale motion (.40); Draft 6004 notice of sale (.20);	2.20	260.00	572.00
1/18/22	KAT	Telephone conference with Kevin Otus re: information needed for sale motion and first amendment (.30); Review revised sale motion and new comments (.30); Telephone conference with Kevin Otus re: agricultural manager (.20); revise first amendment re: land maintenance (.20); E-mail correspondence to Kevin Otus re: land manager (.10); Telephone conference with Kevin Otus re: lenders position on land manager (.20); revise first amendment language on land maintenance (.20); E-mail correspondence to Kevin Otus re: revised first amendment (.10);	1.60	550.00	880.00
1/18/22	TM	Review and incorporate Kristine A. Thagard revisions to sale motion;	.50	350.00	175.00
1/19/22	LB	Conference with Tinho Mang re: status of sale motion (.10); Review and revise amendment to purchase agreement (.10); Correspondence to Jeff Azure and Kevin Otus re: marketing summary and declarations in support of sale motion (.10);	.30	260.00	78.00

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Date	Atty	Description	Hours	Rate	Amount
1/19/22	LB	Multiple conferences with Tinho Mang and Kristine A. Thagard re: revisions to sale motion (.20); Research potential interested parties related to title (.30); Review and finalize motion, table of authorities, declaration of Richard A. Marshack and request for judicial notice (1.1); Preparation of evidence in support of motion (.50); Review and finalize notice of motion (.20); Review and finalize 6004 notice and attachments re: bid procedures (.20);	2.50	260.00	650.00
1/19/22	KAT	E-mail correspondence with Tinho Mang re: bank deadlines (multiple 7+) (.30); E-mail correspondence with Kevin Otus re: bank deadlines (multiple) (.20); Revise amendment to reflect bank deadlines (.20); E-mail correspondence to Victor Sahn and Bruce McBirney re: revised amendment (.20); Supplement sale motion re: assignment and assumption documents (.30); Review First American title report for additional exceptions including PACA (.20); Telephone conference with Tinho Mang re: sale motion and additional items, including PACA (1.0); Review PACA information (.30); E-mail correspondence to Victor Sahn and Bruce McBirney re: draft sale motion (.20); Review and further revisions to sale motion and e-mail correspondence with Tinho Mang re same (.40); E-mail correspondence with Layla Buchanan re: exhibits (multiple) (.20); Telephone conference with Richard A. Marshack and Tinho Mang re: motion (.10); Telephone conference with Layla Buchanan re: final motion (.10); Review final motion (.30);	4.00	550.00	2,200.00
1/19/22	TM	Telephone conference with Kristine A. Thagard re: detailed review, revision, and discussion of sale motion and title issues;	1.00	350.00	350.00
1/19/22	TM	Telephone conference with Michael Gomez re: lien and title issues for sale motion;	.30	350.00	105.00
1/19/22	TM	Update and revise sale motion per discussion with Kristine A. Thagard and declaratory evidence from brokers, to resolve new title issues, multiple written correspondences with Michael Gomez re: approval by lender;	2.80	350.00	980.00
1/19/22	TM	Multiple telephone conferences with Kristine A. Thagard, Richard A. Marshack, Lori Ensley, and Michael Gomez re: sale procedures and fruit collection issues;	.90	350.00	315.00
1/21/22	KAT	Review e-mail correspondence with Tinho Mang and Michael Gomez (multiple) re: approval of revised legal description in the sale motion (.20); E-mail correspondence to Victor Sahn re: amendment and legal description (.20);	.40	550.00	220.00
1/21/22	TM	Written correspondence with Michael Gomez re: rejection of purchase offers for San Marcos and Texas Road properties by Farm Credit;	.10	350.00	35.00

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Date	Atty	Description	Hours	Rate	Amount
1/25/22	TM	Telephone conference with Don Daniels from WarRoom re: notice of sale motion;	.10	350.00	35.00
1/25/22	TM	Telephone conference with Richard A. Marshack and Lee Coddling re: collections issues (.60); Telephone conference with Richard A. Marshack, Kevin Otus, and Lee Coddling re: purchase offer on San Marcos and Texas Road properties (.90);	1.50	350.00	525.00
1/26/22	KAT	Telephone conference Tinho Mang and David A. Wood (part) re: sale motion and issue of pending contingencies and hearing (.40); Review conditional opposition of Farm Credit (.10); Review e-mail correspondence between Tinho Mang and Farm Credit to resolve issues (.10);	.60	550.00	330.00
1/26/22	DAW	Conference with Kristine A. Thagard and Tinho Mang re: sale hearing strategy;	.30	490.00	147.00
1/26/22	TM	Telephone conference with Kristine A. Thagard and David A. Wood re: discussion of closing escrow issues and timeline;	.40	350.00	140.00
1/27/22	KAT	Review management agreement and e-mail correspondence with Tinho Mang re: same (.30);	.30	550.00	165.00
1/27/22	TM	Telephone conference with Richard A. Marshack, Kevin Otus, and Pam Kraus re: sale and due diligence status from Riboli, addressing demand for payment from Coddling;	.40	350.00	140.00
1/28/22	KAT	E-mail correspondence from Anthony Riboli re: title issues (.10); Prepare detailed response to title issues and e-mail correspondence re: same (2.20); Telephone conference with Tinho Mang re: subordination agreement and agricultural management agreement (.20); Revise First Amendment (.30); E-mail correspondence with Bruce McBirney re: sale motion and provided requested back up (.20); E-mail correspondence to Layla Buchanan and Tinho Mang re: transcript to prove domicile (.10); Telephone conference Richard A. Marshack re: title issues and response (.20);	3.30	550.00	1,815.00
1/29/22	KAT	Review and analyze e-mail from Bruce McBirney re: title issues (.20); E-mail correspondence with Kevin Otus re: title issues (.10);	.30	550.00	165.00
1/31/22	KAT	E-mail correspondence to Bruce McBirney re: outstanding title issues (.20); Telephone conference Elsa Garcia at Fidelity re: title exceptions (.30); Detailed E-mail correspondence to Elsa Garcia re: treatment of title exceptions (.70);	1.20	550.00	660.00
2/01/22	KAT	E-mail correspondence to Victor Sahn and Bruce McBirney re: outstanding issues (.30); Review disclosure documents and e-mail correspondence with Chanel Mendoza (multiple) and Tina Cabot re: finalization (.40);	.70	550.00	385.00

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Date	Atty	Description	Hours	Rate	Amount
2/02/22	KAT	Review and analyze of E-mail from Victor Sahn re: outstanding issues and respond (.40); E-mail correspondence from Tinho Mang re: order (.10); Telephone conference Richard A. Marshack re: status (.10); Telephone conference with Kevin Otus re: bank and schedule for closing (.20); E-mail correspondence to Tina Cabot and Kevin Otus re: disclosures (.20);	1.00	550.00	550.00
2/03/22	KAT	Draft language for findings of fact and sale order (1.50); E-mail correspondence to Victor Sahn and Bruce McBirney re: findings and sale order, first amendment and agricultural management agreement (.30); E-mail correspondence from Victor Sahn re: position re: hearing and sale (.20); E-mail correspondence and Telephone conference with Tinho Mang re: banks position on sale date (.30); Telephone conference with Kevin Otus re: position of Riboli (.20); E-mail correspondence from Tinho Mang to FCW re: position of Riboli (.10);	2.60	550.00	1,430.00
2/04/22	KAT	E-mail correspondence and Telephone conference with Victor Sahn re: pending motion (.40); Telephone conference with Tinho Mang re: stipulation for continuance (multiple) (.20); Review proposed stipulation (.20);	.80	550.00	440.00
2/04/22	TM	Draft stipulation to continue sale hearing and telephone conference with Kristine A. Thagard re: same;	.70	350.00	245.00
2/04/22	TM	Telephone conference with Richard A. Marshack re: discussion of requested continuance of sale hearing;	.20	350.00	70.00
2/05/22	KAT	E-mail correspondence from Michael Gomez re: extension (.10); Telephone conference with Richard A. Marshack re: bank (.20); Review title report for dates of prior notices and review of timing/notice requirements for notice of sale (.40); E-mail correspondence to Tinho Mang re: stipulation and review filed stipulations (.20);	.90	550.00	495.00
2/06/22	KAT	E-mail correspondence from Tinho Mang and review stipulation re: Enforcement Date extension (.20); E-mail correspondence to Victor Sahn re: dates and sale motion- items needed from him (.20);	.40	550.00	220.00
2/07/22	KAT	E-mail correspondence with Tinho Mang re: sale dates (multiple) (.10); E-mail correspondence from Victor Sahn (multiple) re: survey and sale date (.20); Review survey and Telephone conference Tinho Mang re same (.50); Review additional demands from Victor re: Property and survey (.40); Telephone conference with Richard A. Marshack (part), Kevin Otus (part) and Tinho Mang re: survey issues and current position of bank (.50);	1.70	550.00	935.00
2/07/22	TM	Review written correspondence from Victor Sahn with survey drawings showing fence and lot line, telephone conference with Kristine A. Thagard re: same (No Charge);	.40	350.00	N/C



MARSHACK HAYS LLP

Richard Marshack, Trustee  
Client-Matter# 1015-146

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Date	Atty	Description	Hours	Rate	Amount
2/07/22	TM	Telephone conference with Richard A. Marshack, Kristine A. Thagard, and Kevin Otus re: sale hearing and negotiations with buyer, lot line dispute;	.50	350.00	175.00
2/08/22	LB	Review and respond to correspondence from Kristine A. Thagard re: preparation of documents for disclosures related to sale of property (.10); Review disclosure and documents related to same (.30);	.40	260.00	104.00
2/08/22	LB	Conference with Tinho Mang re: preparation of sale order (.10); Review case file (.10); Draft proposed sale order (.30); Preparation of materials for hearing on sale motion (.10);	.60	260.00	156.00
2/08/22	KAT	Review disclosure documents and multiple Telephone conference with Tina Cabot re: revisions and compilation (1.20); Review sale order and prepare findings of fact (.50); E-mail correspondence with Tinho Mang and Layla Buchanan re: legal description (multiple) (.30); Review revised order and findings (.20); E-mail correspondence to Victor Sahn and Bruce McBirney re: order (.20); Review exceptions to title and e-mail correspondence to Elsa Garcia at Fidelity (.40); E-mail correspondence with Victor Sahn re: order, amendment and declaration (multiple) (.40); E-mail correspondence from Elsa Garcia at Fidelity re: order and e-mail correspondence to Tinho Mang re same (.10); Quick review of proposed order from Victor Sahn and e-mail correspondence to Tinho Mang re same (.30);	3.60	550.00	1,980.00
2/08/22	TM	Review and revise draft sale order and findings of fact, written correspondence with Kristine A. Thagard re: same;	.50	350.00	175.00
2/08/22	TM	Written correspondence with Kristine A. Thagard re: revision to sale order based on comments from title;	.10	350.00	35.00
2/09/22	KAT	Review tentative ruling (.10); E-mail correspondence to Tinho Mang re: revisions to order (.10);	.20	550.00	110.00
2/09/22	KAT	Review revised order and e-mail correspondence to Elsa Garcia re same (.20); Telephone conference with Kevin Otus re: disclosure statement and e-mail correspondence to Kevin Otus with AVID (.30); Telephone conference with Victor Sahn re: order and outstanding issues (.20); Telephone conference Kevin Otus re: drilling and contingencies (.20); Prepare for and appear at hearing (1.70); E-mail correspondence with Victor Sahn re: order and amendment (.20);	2.80	550.00	1,540.00
2/09/22	TM	Telephone conference with Kristine A. Thagard re: revisions to draft sale order and make revisions;	.20	350.00	70.00
2/09/22	TM	Preparation for and attendance at hearing on sale motion (No Charge);	2.10	350.00	N/C

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Date	Atty	Description	Hours	Rate	Amount
2/11/22	KAT	E-mail correspondence with Tinho Mang re: order (.20); Telephone conference with Kevin Otus re: disclosures and survey (.20);	.40	550.00	220.00
2/11/22	TM	Multiple written correspondences with Lee Coddling and Michael Gomez re: discussion of bulk wine inventory liquidation;	.20	350.00	70.00
2/14/22	KAT	Telephone conference with Kevin Otus re: survey issues and drilling (.20); E-mail correspondence to Tinho Mang re: Order (.10);	.30	550.00	165.00
2/14/22	KAT	Review revised first amendment from Victor Sahn and e-mail correspondence to Chanel Mendoza re: execution copy (.30); E-mail correspondence to Antonia Delgado re: escrow (.20);	.50	550.00	275.00
2/15/22	KAT	Telephone conference with Anthony Riboli, Kevin Otus, Kevin Ralph and Richard A. Marshack re: title issues, drilling, fence issues, residence and moving matters forward (.90); Telephone conference with Richard A. Marshack re: credit issue (.20); Telephone conference Kevin Otus re: drilling and insurance (.20);	1.30	550.00	715.00
2/16/22	KAT	Review Miller Certificate of Insurance (.10); Telephone conference with Kevin Otus confirming drilling and discussion re: back up offer and other properties (.20); E-mail correspondence to Tinho Mang re: order and drilling (.10); Telephone conference with Tinho Mang re: order (multiple) (.20); Review and revise proposed stipulation including message to Kevin Otus to confirm dates (.30); E-mail correspondence to Victor Sahn with proposed stipulation, amendment and issues with declaration (.30); Message from Kevin Otus re: drilling (.10);	1.30	550.00	715.00
2/16/22	TM	Review written correspondence from Kevin Otus re: insurance for Miller;	.10	350.00	35.00
2/16/22	TM	Draft stipulation re: delay of sale order and telephone conference with Kristine A. Thagard re: revision of sale order;	.60	350.00	210.00
2/18/22	KAT	E-mail correspondence with Tina Cabot re: status of sale and closing (.20); E-mail correspondence from Antonia Delgado re: lien/title issues, and prepare response (.20);	.40	550.00	220.00
2/22/22	LB	Conference with Richard A. Marshack re: disclosure related to the sale of the property (.10); Review disclosures re: same (.20);	.30	260.00	78.00
2/22/22	KAT	E-mail correspondence (multiple) with Victor Sahn and Anthony Riboli re: disclosures, order and title issues (survey) (.30); Review disclosures (.20); Review transcripts for entity (.30); Telephone conference with Richard A. Marshack re: disclosures (.20); Telephone conference with Tinho Mang re: findings and order (.20); Review and revise findings of fact and order (.60);	1.80	550.00	990.00
2/22/22	TM	Revise findings of fact and conclusions of law and sale order and written correspondence to Kristine A. Thagard re: same;	.60	350.00	210.00



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Date	Atty	Description	Hours	Rate	Amount
2/23/22	LB	Conference with Kristine A. Thagard re: preparation of findings of facts and proposed sale order (.10); Review and revise sale order and findings of facts related to sale motion (.20);	.30	260.00	78.00
2/23/22	KAT	E-mail correspondence from Kevin Otus and Pam Kraus (multiple) re: Lee Coddling (.20); E-mail correspondence to Victor Sahn and Michael Gomez re: revised order and findings of fact (.20); Review comments of Michael Gomez and e-mail correspondence to Tinho Mang re same (.20); E-mail correspondence from Victor Sahn re: order (.10); E-mail correspondence with Tinho Mang (multiple) re: revisions (.20);	.90	550.00	495.00
2/23/22	TM	Review comments on sale order and findings from Michael Gomez and written correspondence from Victor Sahn re: same;	.10	350.00	35.00
2/23/22	TM	Incorporate additional comments to sale order and findings of fact and written correspondence with Kristine A. Thagard re: same;	.20	350.00	70.00
2/24/22	TM	Written correspondence with Kevin Otus re: response to buyer questions on harvest;	.20	350.00	70.00
2/25/22	KAT	E-mail correspondence from Victor Sahn re: findings and order and prepare detailed response (.60); E-mail correspondence to Layla Buchanan re: disclosures (.10); E-mail correspondence to Victor Sahn with executed disclosures (.10); E-mail correspondence with Victor Sahn re: order (multiple) (.30);	1.10	550.00	605.00
2/25/22	TM	Review multiple written correspondences between Kristine A. Thagard and Victor Sahn re: sale negotiations;	.10	350.00	35.00
2/25/22	TM	Revise and update sale order to incorporate revisions from Michael Gomez and written correspondence with Kristine A. Thagard re: addressing comments on insurance reimbursements;	.30	350.00	105.00
2/25/22	TM	Telephone conference with Michael Gomez re: status of fence quote and discussion of sale order negotiations;	.30	350.00	105.00
2/25/22	TM	Telephone conference with Kevin Otus re: response to buyer's inquiries on harvest;	.20	350.00	70.00
2/28/22	KAT	Telephone conference with Kevin Otus re: outstanding issues (.20); E-mail correspondence to Kevin Otus with E-mail trail of exchanges re: order and findings and e-mail correspondence to Tinho Mang re: Victor Sahn (.20); Telephone conference with Tinho Mang re: order and review outline of revisions (.20); E-mail correspondence with title and escrow re: revised order and request approval from title (.20); E-mail correspondence from Anthony Riboli re: order (.10); E-mail correspondence from Anthony Riboli re: order (.10); Telephone conference with Tinho Mang re: final order and bank approval (.10);	1.10	550.00	605.00

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Date	Atty	Description	Hours	Rate	Amount
2/28/22	TM	Written correspondence with Victor Sahn re: detailed description of unacceptable terms in sale order;	.80	350.00	280.00
2/28/22	TM	Telephone conference with Kevin Otus re: sale negotiations;	.20	350.00	70.00
2/28/22	TM	Review fence quote from Michael Gomez and forward same to Victor Sahn;	.20	350.00	70.00
2/28/22	TM	Telephone conference with Kevin Otus re: further sale issues;	.10	350.00	35.00
3/01/22	LB	Multiple conferences with Tinho Mang and Kristine A. Thagard re: preparation of sale order and findings of facts related to sale order (.20); Review and finalize sale order and signatures to same (.20); Review and finalize statement of facts, signatures to same, and evidence in support of same (.40); Conference with James at Court re: statement of facts and evidence in support of same (.10);	.90	260.00	234.00
3/01/22	LB	Conference with Tina Duarte re: findings of fact and conclusions of law (.10); Conference with Tinho Mang re: preparation of exhibit to the findings of facts and conclusions of law (.10); Review and finalize findings of fact and conclusions of law and exhibit to same (.30);	.50	260.00	130.00
3/01/22	KAT	Telephone conference with Layla Buchanan re: order and findings and revisions necessary to lodge (.20);	.20	550.00	110.00
3/01/22	KAT	Telephone conference with Layla Buchanan re: issue with order (.10); Telephone conference with Tinho Mang re: order (.20);	.30	550.00	165.00
3/02/22	LB	Conference with Kristine A. Thagard re: preparation of executed documents re: PSA (.10); Preparation of bill of sale, grant deed and settlement agreement for execution (.30);	.40	260.00	104.00
3/02/22	KAT	Telephone conference Victor Sahn re: transaction (.20); E-mail correspondence to Tinho Mang and Chanel Mendoza re: bill of sale and assignments (.10); E-mail correspondence to Bruce McBirney re: title (.20); E-mail correspondence with Antonia Delgado re: closing (.20); Telephone conference with Layla Buchanan re: execution documents (.10); E-mail correspondence from Victor Sahn and Tinho Mang re: amendment, review amendment and e-mail correspondence to Richard A. Marshack re same (.20); Telephone conference with Richard A. Marshack re: closing and documents (.10); Telephone conference with Kevin Otus re: drilling and closing (.20); Telephone conference with Kevin Otus re: San Marcos property neighbor as potential buyer (.20); E-mail correspondence from Jon Ansolabehere re: neighbor and e-mail correspondence to Kevin Otus re same (.10);	1.60	550.00	880.00

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Date	Atty	Description	Hours	Rate	Amount
3/03/22	KAT	E-mail correspondence from Victor Sahn re: closing (.10); Review PSA and prepare closing checklist (.40); Telephone conference with Richard A. Marshack, Pam Kraus and Kevin Otus re: closing, fence, equipment, taxes and bank distribution (.70) E-mail correspondence to Tinho Mang re: carve-out (.10); E-mail correspondence from Tinho Mang re: fence issue and indemnity (.10); E-mail correspondence to Antonia re: closing documents (.20); E-mail correspondence with Kevin Otus re: closing documents (.20); Review proposed partial reconveyance of Farm Credit from Michael Gomez and forward to title (.20); Telephone conference Tinho Mang re: carve out agreements (.30); Telephone conference with Richard A. Marshack re: taxes on San Marcos (.20); E-mail correspondence with title re: partial release (multiple) (.30); E-mail correspondence to Michael Gomez re: second deed of trust for release (.20); Telephone conference with Richard A. Marshack re: documents to be executed and e-mail correspondence re same (.30); E-mail correspondence with Bruce McBirney and Michael Gomez re: releases of deeds of trust including review of prelim (multiple- lengthy) (.30); E-mail correspondence with Michael Gomez re: equipment (multiple) (.20); E-mail correspondence from Keven Otus re: fence issue, equipment and escrow (.20); Telephone conference with Bruce McBirney re: title issues and resolution (.40); Update signature documents and telephone conference and e-mail correspondence with Richard A. Marshack re: same (.30); Review subordination agreement for charge and credits and e-mail correspondence with Antonia Delgado re: charges and estimated statement and review statement (1.20); E-mail correspondence with Pam Kraus, Richard A. Marshack and Tinho Mang re: deposit and journal entry (multiple) (.40);	6.20	550.00	3,410.00
3/03/22	TM	Written correspondence with Richard A. Marshack re: distribution of proceeds if San Marcos or Texas Road are sold;	.10	350.00	35.00
3/04/22	LB	Conference with Court Clerk re: status of entry of sale order (.10); Conference with Tinho Mang re: same and of entry of the statement of facts (.10); Review and respond to correspondence from Kristine A. Thagard re: certified copies of sale order and corresponding documents in support (.10); Preparation of request for certified copy of sale order, findings of facts and conclusions of law and supporting document (.10);	.40	260.00	104.00

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Date	Atty	Description	Hours	Rate	Amount
3/04/22	KAT	E-mail correspondence with Pam Kraus re: deposit, journal entry and insurance, including review of Seller's statement re same (.30); E-mail correspondence with Tinho Mang re: totals (.10); Telephone conference with Pam Kraus re: closing statement and insurance charges (.30); Telephone conference with Kevin Otus re: equipment (.20); E-mail correspondence from Victor Sahn with outstanding issues and prepare response (.30); E-mail correspondence with Antonia Delgado re: instructions to Buyer and treatment of deposit (multiple) (.30); E-mail correspondence with Layla Buchanan re: order (multiple) (.20); E-mail correspondence with Antonio Delgado re: documents and requests of buyers (.20); E-mail correspondence from Victor Sahn re: water report and preliminary review of same (.30); Telephone conference Victor Sahn re: status (.10);	2.30	550.00	1,265.00
3/04/22	TM	Review escrow estimated statement and written correspondence with Kristine A. Thagard re: same;	.10	350.00	35.00
3/07/22	KAT	E-mail correspondence from Layla Buchanan re: certified order and review documents(.20); E-mail correspondence to Antonia Delgado re: certified orders (.10); E-mail correspondence to Victor Sahn and Bruce McBirney re: certified order (.10); Review escrow instructions and documents to complete (.70); E-mail correspondence to Pam Kraus re: 593 withholding and insurance(.20); Telephone conference with Antonia Delgado re: seller's estimate and application of deposit (.20); E-mail correspondence with Victor Sahn and Bruce McBirney re: proforma, endorsements and instructions (.20); Review insurance costs and e-mail correspondence with Tinho Mang re same (.10); E-mail correspondence from Antonia Delgado with revised closing statement, analysis and e-mail correspondence to Antonia with inaccuracies (.30); E-mail correspondence (multiple) with Michael Gomez re: estimated closing statement, equipment and partial reconveyance (.20); Review alleged 2019 partial reconveyance and e-mail correspondence to Bruce McBirney re: same (.20); E-mail correspondence to title re: 2nd partial reconveyance (.20); Telephone conference Antonia Delgado re: estimated closing statement (.20); E-mail correspondence with Tinho Mang and Antonia Delgado re: lender demand (.10); E-mail correspondence to title re: reconveyance of 2010 deed of trust (.20); E-mail correspondence to Michael Gomez re: 2010 payment and form of reconveyance (.10);	3.30	550.00	1,815.00
3/07/22	TM	Telephone conference with Kristine A. Thagard and Richard A. Marshack re: status of closing sale and outstanding issues;	.20	350.00	70.00
3/07/22	TM	Written correspondence with Michael Gomez re: proof of insurance paid;	.10	350.00	35.00

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Date	Atty	Description	Hours	Rate	Amount
3/08/22	LB	Correspondence to Kristine A. Thagard re: status of executed documents re: purchase agreement (No Charge);	.10	260.00	N/C
3/08/22	KAT	E-mail correspondence from Kevin Otus re: Riboli rejection of equipment (.10); E-mail correspondence to Bruce McBirney re: line of credit (.10); E-mail correspondence with Antonia Delgado re: payoff demand to bank (.10); Review and analyze revised estimated closing statement (.20); E-mail correspondence to Antonio Delgado re: new estimate (.10); E-mail correspondence to Michael Gomez re: payoff demand and estimate (.30); E-mail correspondence to Tinho Mang re: estimate (.10); E-mail correspondence with title (multiple) re: reconveyance (.20); Telephone conference with Kevin Otus re: transaction (.20); E-mail correspondence and message to Michael Gomez re: reconveyance (.30); E-mail correspondence from Victor Sahn re: revised language for escrow instruction and reply with alternate language (.40); E-mail correspondence from Bruce McBirney re: objections to title and review same (.30); E-mail correspondence to Victor Sahn re: proposed language (.10); E-mail correspondence with Kevin Otus re: proposed language (.10); E-mail correspondence from Antonia re: communications with Farm Credit (.10);	2.70	550.00	1,485.00
3/08/22	TM	Review estimated escrow statement and written correspondence with Kristine A. Thagard re: same;	.10	350.00	35.00
3/09/22	KAT	Telephone conference with Pam Kraus re: tax issue (.20); Review Codding purchase agreement for basis issues (.30); E-mail correspondence with Don Fife and Pam Kraus re: tax basis and entity (multiple) (.30); Telephone conference with Tinho Mang re: tax basis issue (.20); E-mail correspondence to Kevin Otus re: allocation of value (.10); Review revised escrow instructions (.20); Telephone conference with David A. Wood re: sale (.10); Telephone conference with Richard A. Marshack re: sale and escrow documents (.20); E-mail correspondence with Bruce McBirney, Victor Sahn and Antonia Delgado re: escrow instructions, assignment and other outstanding items (multiple 8+) (.40); Telephone conference with Antonia Delgado re: assignment and other documents (.20); Complete tax documents, including e-mails with Don Fife re: same and e-mail correspondence to Tinho Mang and Richard A. Marshack re: same (.40); E-mail correspondence to Richard A. Marshack re: balance of escrow documents (.10);	2.50	550.00	1,375.00
3/09/22	TM	Telephone conference with Kristine A. Thagard re: sale negotiations and outstanding issues, tax liability (No Charge);	.20	350.00	N/C
3/09/22	TM	Review escrow documents from Kristine A. Thagard and written correspondence with Kristine A. Thagard re: review of same;	.20	350.00	70.00

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Date	Atty	Description	Hours	Rate	Amount
3/10/22	KAT	Review e-mail correspondence with Bank, Kevin Otus and Buyer re: maintenance of Live Oak Property and equipment removal (multiple 8+) (.30); Telephone conference with Richard A. Marshack and Kevin Otus re: interest in San Marcos and Live Oak closing (.40); Telephone conference with Richard A. Marshack and Antonia Delgado re: final documents (.20) E-mail correspondence with Richard A. Marshack re: final documents (multiple 6+) (.30); Telephone conference with Bruce McBirney re: closing and final documents (.20); E-mail correspondence with Victor Sahn and Bruce McBirney re: partial reconveyance and closing (.20); E-mail correspondence from Antonia Delgado confirming receipt of all of documents (.10);	1.70	550.00	935.00
3/11/22	KAT	E-mail correspondence with Victor Sahn and escrow re: final documents and lender (multiple) (.20);	.20	550.00	110.00
3/11/22	KAT	E-mail correspondence with Elizabeth Fuentes (escrow) re: receipt of all Seller documents and approval of Farm Credit release (multiple) (.20); E-mail correspondence from Victor Sahn re: buyer documents and escrow's response (.10); Telephone conference with Kevin Otus re: announcement and San Marcos (.20);	.50	550.00	275.00
3/13/22	KAT	E-mail correspondence (multiple) with Victor Sahn re: closing (.20);	.20	550.00	110.00
3/14/22	KAT	E-mail correspondence from Antonia Degado re: closing (.10);	.10	550.00	55.00
3/15/22	TM	Telephone conference with Kristine A. Thagard and Kevin Otus re: marketing efforts on San Marcos and Texas Road property;	.20	350.00	70.00
3/16/22	KAT	Telephone conference Pam Kraus re: closing statement (.10); Review and analyze final closing statement and confirm numbers to Trustee (.30); E-mail correspondence to Antonia Delgado re: final closing statement and payouts (.10);	.50	550.00	275.00
3/17/22	KAT	Review and approve report of sale, final closing statement and e-mail correspondence with Pam Kraus re same (.20); E-mail correspondence with Onyx and e-mail correspondence with David A. Wood re: Onyx services (multiple) (.30); Telephone conference with David A. Wood re: Onyx (.10); Telephone conference with Richard A. Marshack and Kevin Otus (part) re: payment and sale of Live Oak (.20); Telephone conference Kevin Otus re: property taxes on Live Oak (.10);	.90	550.00	495.00
3/17/22	DAW	Review and respond to e-mail correspondence from Kristine A. Thagard re: closing of Live Oak;	.10	490.00	49.00
3/17/22	DAW	Conference with Kristine A. Thagard re: closing of Live Oak and payment to brokers;	.30	490.00	147.00



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Date	Atty	Description	Hours	Rate	Amount
3/18/22	KAT	E-mail correspondence with Antonia Delgado re: payment to Onyx (multiple) (.20); E-mail correspondence with Kylie Henderson re: payment Onyx (.10);	.30	550.00	165.00
3/22/22	KAT	E-mail correspondence with Richard A. Marshack and Kevin Otus re: San Marcos offer and interest (.20); E-mail correspondence from Antonia Delgado re: revised statements re: payment of commissions, approve documents and e-mail correspondence re same to Antonia Delgado and Pam Kraus (.20);	.40	550.00	220.00
3/22/22	TM	Telephone conference with Richard A. Marshack re: negotiations on sale of San Marcos;	.20	350.00	70.00
3/29/22	TM	Telephone conference with Richard A. Marshack and Kevin Otus re: sale prospects for San Marcos;	.10	350.00	35.00
<b>Sub-Total Fees:</b>			<b>268.50</b>		<b>\$ 128,335.00</b>

3 Business Operations

Date	Atty	Description	Hours	Rate	Amount
6/23/21	DAW	Review and analyze the two (2) insurance policies we have been provided (.40); Review and respond to multiple e-mail correspondence from Pam Kraus and Kristine A. Thagard re: same (.20); Draft and send e-mail correspondence to Reed Waddell and Michael Gomez counsel for Farm Credit West re: the attached policies for review and request to make payment by this week (.10);	.70	490.00	343.00
6/24/21	TM	Begin drafting motion to authorize operation of debtor's business;	4.10	350.00	1,435.00
6/25/21	DAW	Review and analyze the FRBP 1019 report filed by the Debtor for post-petition assets and liabilities;	.30	490.00	147.00
6/30/21	DAW	Conference with Pam Kraus re: motion to operate and discussions with the U.S. Trustee;	.20	490.00	98.00
7/06/21	KAT	E-mail correspondence from Richard Twardowski re: insurance policies and e-mail correspondence to David A. Wood re same (.30);	.30	550.00	165.00
7/07/21	KAT	E-mail correspondence from Richard Twardowski re: insurance (.10); Telephone conference with David A. Wood re: lender and insurance (.20); Telephone conference with Pam Kraus re: insurance issues (.30); E-mail correspondence with David A. Wood and Reed Waddell re: insurance (multiple) (.30); Telephone call and e-mail correspondence to Christine Shadowens re: addition of trustee and lender to policies (.30);	1.20	550.00	660.00

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Date	Atty	Description	Hours	Rate	Amount
7/08/21	LB	Conference with David A. Wood re: preparation of motion to extend 365 deadline (.10); Draft motion to extend 365 deadline and declaration of Richard A. Marshack in support of same (.60);	.70	260.00	182.00
7/08/21	KAT	E-mail correspondence from Christina Shadowens re: endorsements to the policies and e-mail correspondence to David A. Wood and Tinho Mang re same (.20); E-mail correspondence with Richard Twardowski re: payment (.30);	.50	550.00	275.00
7/09/21	LB	Draft notice of motion to extend 365 deadlines;	.30	260.00	78.00
7/09/21	KAT	Telephone conference with Tinho Mang re: insurance (.20); E-mail correspondence with David A. Wood re: insurance and broker (.20);	.40	550.00	220.00
7/09/21	DAW	Draft and revise the motion to extend the 365 deadline;	1.10	490.00	539.00
7/15/21	LB	Conference with D. Edward Hays preparation of motion to extend 365 deadlines (.10); Review and revise motion to extend 365 deadlines (.20);	.30	260.00	78.00
7/16/21	DEH	Revisions of Tinho Mang 365 extension motion;	.30	650.00	195.00
7/16/21	PK	Review and revise Trustee's motion to extend 365 deadline (.20); Review and revise notice of hearing (.20); Locate, organize and bates stamp exhibits (.10); Add pin cites to motion (.20);	.70	280.00	196.00
7/16/21	LB	Conference with Tinho Mang re: further revisions to 365 deadline motion (.10); Review and revise motion and declaration of Richard A. Marshack (.30); Review and revise notice of same (.10);	.50	260.00	130.00
7/16/21	TM	Review and conform D. Edward Hays revisions to 365 extension motion;	.30	350.00	105.00
7/19/21	TM	Telephone conference with Richard A. Marshack and Jeff Azure re: insurance payments to be added to operating budget;	.10	350.00	35.00
7/20/21	TM	Multiple written correspondences between David A. Wood and Richard A. Marshack re: budget for approval by Farm Credit;	.20	350.00	70.00
7/21/21	TM	Telephone conference with Lori Ensley re: asset analysis and discussion of proposed operating budget line items;	.30	350.00	105.00
7/21/21	TM	Telephone conference with Richard A. Marshack re: operating budget;	.10	350.00	35.00
7/21/21	TM	Telephone conference with Kristine A. Thagard re: insurance litigation and analysis of policies and extent of coverage, written correspondence to Kristine A. Thagard re: same;	.30	350.00	105.00
7/22/21	TM	Revise operating budget and written correspondence with Richard A. Marshack re: same;	.30	350.00	105.00
7/22/21	TM	Telephone conference with Richard A. Marshack and Lee Coddling re: discussion of operation agreement and current status of farming;	.30	350.00	105.00



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Date	Atty	Description	Hours	Rate	Amount
7/22/21	TM	Revise management/farm operation agreement per Richard A. Marshack suggestions and written correspondence to Richard A. Marshack re: same;	.40	350.00	140.00
7/23/21	TM	Telephone conference with Richard A. Marshack re: review and revision of farm operator agreement;	.20	350.00	70.00
7/26/21	TM	Review and revise farm management agreement, telephone conference with Richard A. Marshack re: same;	.50	350.00	175.00
8/03/21	LB	Draft order granting motion to extend deadline re: contracts (.20);	.20	260.00	52.00
8/04/21	TM	Telephone conference with Richard A. Marshack and Pam Kraus re: procuring insurance and discussion of farm management agreement;	.50	350.00	175.00
8/04/21	TM	Begin revising and drafting motion to approve farm operator agreement and to operate for limited purpose of harvesting crops, multiple written correspondences with Lee Codding re: same;	1.30	350.00	455.00
8/05/21	LB	Conference with Tinho Mang re: hearing on motion to extend time to assume or reject executory contracts (.10); Preparation of materials for hearing (.10);	.20	260.00	52.00
8/05/21	TM	Revise and finish first revised draft of motion to approve farm operator agreement and for operations;	3.70	350.00	1,295.00
8/05/21	TM	Multiple written correspondences with Lee Codding and Richard A. Marshack re: necessity of court approval for farm management operations and telephone conference with Richard A. Marshack re: same;	.30	350.00	105.00
8/06/21	TM	Revise and supplement farm operation motion and draft declarations re: same, multiple clarifying written correspondences with Lee Codding re: same;	2.00	350.00	700.00
8/06/21	TM	Telephone conference with Richard A. Marshack re: farm operator agreement and declaration in support;	.20	350.00	70.00
8/09/21	LB	Conference with Tinho Mang re: preparation of motion to operate;	.10	260.00	26.00
8/09/21	DAW	Review and revise declaration of non-opposition and order granting the motion to extend the 365 deadline;	.20	490.00	98.00
8/09/21	DAW	Review and analyze motion to employ Lee Codding as operator and lease termination agreement with Rabbit Ridge (No Charge);	.90	490.00	N/C
8/09/21	TM	Telephone conference with Richard A. Marshack re: review and revision of motion to operate and declarations in support;	.80	350.00	280.00
8/09/21	TM	Revise and supplement motion to operate per Richard A. Marshack revisions and requested supplement re: cash collateral;	.70	350.00	245.00
8/09/21	TM	Preparation for and attendance at hearing on 365 extension;	.40	350.00	140.00

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Richard Marshack, Trustee  
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Date	Atty	Description	Hours	Rate	Amount
8/09/21	TM	Draft and revise order on 365 extension motion;	.20	350.00	70.00
8/09/21	TM	Draft and revise notice of motion to operate;	.10	350.00	35.00
8/17/21	TM	Written correspondence with Pam Kraus re: insurance quote and telephone conference with Pam Kraus re: insurance issues;	.20	350.00	70.00
8/17/21	TM	Written correspondence with Lee Codding re: demand for insurance policies for operating entity;	.10	350.00	35.00
8/26/21	TM	Written correspondence to Richard A. Marshack re: revised terms proposed for farm operator agreement and distribution of proceeds;	.10	350.00	35.00
8/31/21	LB	Review case file (.10); Draft order on motion to approve farm operator agreement (.20);	.20	260.00	52.00
9/02/21	LB	Review and finalize order to operate farm;	.10	260.00	26.00
9/07/21	TM	Review entered farm operator order and written correspondence to Pam Kraus and Lee Codding re: same;	.20	350.00	70.00
9/08/21	TM	Brief telephone conference with Richard A. Marshack re: farm management agreement approved and tax basis for property;	.10	350.00	35.00
9/22/21	TM	Multiple written correspondences with Richard A. Marshack re: grape purchase agreement for 24 tons;	.20	350.00	70.00
9/23/21	TM	Telephone conference with Richard A. Marshack re: grape sale agreement and farm management agreement;	.20	350.00	70.00
9/28/21	DAW	Draft and send e-mail correspondence to Tinho Mang re: further extension of 365 deadline (No Charge);	.10	490.00	N/C
9/28/21	TM	Review partially executed grape purchase contract and written correspondence with Richard A. Marshack re: same;	.20	350.00	70.00
10/05/21	TM	Review grape purchase contract and handwritten amendments for Riboli, multiple written correspondences with Richard A. Marshack re: possible breach of farm management agreement;	.30	350.00	105.00
10/06/21	TM	Review Richard A. Marshack amended grape purchase contract from WarRoom and addenda;	.20	350.00	70.00
10/07/21	TM	Telephone conference with Pam Kraus re: lapsed insurance on Live Oak property;	.20	350.00	70.00
10/13/21	DAW	Review and respond to multiple e-mail correspondence from Tinho Mang re: preparation of a further motion to extend the 365 deadline;	.20	490.00	98.00
10/13/21	TM	Written correspondence with David A. Wood re: extension of executory contract deadline;	.10	350.00	35.00

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Date	Atty	Description	Hours	Rate	Amount
10/14/21	CM	Telephone conference with Kristine A. Thagard re: telephonic appearance at upcoming hearings (.10); Telephone conference with Courtcall representative re: Kristine A. Thagard's telephonic appearance (.10); Review case file and prepare documentation in support of hearings on trustee's motion for order authorizing water well drilling and trustee's overbid procedures motion (.40); Draft e-mail to Kristine A. Thagard and Tinho Mang re: same (.10);	.70	260.00	182.00
10/25/21	LB	Conference with Tinho Mang re: preparation of motion to extend deadline to assume or reject lease;	.10	260.00	26.00
10/25/21	LB	Conference with Tinho Mang re: preparation of motion to extend time to assume/reject contracts and/or leases (.10); Review case file (.20); Draft motion and declaration of Richard A. Marshack in support (.60);	.90	260.00	234.00
11/05/21	TM	Telephone conference with Kristine A. Thagard re: status of negotiations with Farm Credit (.20); Review written correspondence from Victor Sahn and written correspondence to Reed Waddell and Michael Gomez re: concerns from buyer (.20);	.40	350.00	140.00
11/05/21	TM	Telephone conference with Reed Waddell re: negotiations with bank and next steps, written correspondence to Reed Waddell and Michael Gomez re: grape sale agreements;	.60	350.00	210.00
11/10/21	LB	Conference with Tinho Mang re: preparation of motion to extend deadline to assume/reject contracts/leases (.10); Draft notice of motion (.30);	.40	260.00	104.00
11/10/21	LB	Review and revise motion to extend 365 deadline (.10); Preparation of evidence in support of same (.20);	.30	260.00	78.00
11/10/21	KAT	Review and revise motion to extend time accept or reject contracts and declaration of Richard A. Marshack (.40); E-mail correspondence with Tinho Mang re: same (multiple) (.20);	.60	550.00	330.00
11/10/21	TM	Draft second motion to extend 365 deadlines;	1.90	350.00	665.00
11/10/21	TM	Draft and revise notice of second 365 extension motion;	.10	350.00	35.00
11/11/21	LB	Conference with Tinho Mang re: preparation of motion to extend 365 motion (.10); Review and finalize motion (.20); Review and finalize notice (.10);	.40	260.00	104.00
11/15/21	CM	Review and analyze e-mail between Layla Buchanan and Tinho Mang re: preparation of spreadsheet re: grape agreements (.10); Review and analyze multiple grape agreements and addendums (.80); Revise and supplement spreadsheet date of agreements, date of delivery, timing of payment, seller and buyer, amount purchased, crop purchased, price per ton and anticipated proceeds (.90); Draft e-mail to Layla Buchanan re: same (.10);	1.90	260.00	494.00

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Date	Atty	Description	Hours	Rate	Amount
11/15/21	TM	Review summary spreadsheet for grape purchase agreements and written correspondence with Pam Kraus and Lee Coddling re: confirming extent of grape purchase agreements;	.20	350.00	70.00
11/19/21	TM	Review expense sheet from Lee Coddling and written correspondence with Richard A. Marshack and Lori Ensley re: discussion of issues with certain line items;	.20	350.00	70.00
11/19/21	TM	Review and comment projected income sheet from Lee Coddling and written correspondence to Richard A. Marshack and Lori Ensley re: same;	.20	350.00	70.00
12/08/21	TM	Telephone conference with Pam Kraus re: diverted grape proceeds and status of turnover;	.20	350.00	70.00
12/08/21	TM	Telephone conference with Don Brady re: initial questions re: diverted grape proceeds and demand from unauthorized third party to divert proceeds;	.30	350.00	105.00
12/10/21	TM	Review tentative ruling on Monday's hearing to extend deadline to assume or reject contracts;	.10	350.00	35.00
12/13/21	TM	Attendance at hearing on extension of executory contract deadline;	.20	350.00	70.00
12/14/21	TM	Draft and revise order extending deadline to accept or reject executory contracts;	.10	350.00	35.00
12/17/21	TM	Telephone conference with Reed Waddell and written correspondence to Lori Ensley re: dumpster issue and demand for payment from San Miguel Garbage;	.20	350.00	70.00
12/29/21	TM	Written correspondence with Pam Kraus re: update on fruit collections;	.20	350.00	70.00
12/29/21	TM	Telephone conference with Pam Kraus, Lori Ensley, and Richard A. Marshack re: discussion of fruit sale collections and discrepancies between projected income from Coddling and contracted sales;	.30	350.00	105.00
1/12/22	TM	Review grape contracts and checks received, compare, written correspondence to Richard A. Marshack re: summary of missed payments;	.70	350.00	245.00
1/14/22	TM	Telephone conference with Richard A. Marshack re: collection for grape purchase by Riboli;	.10	350.00	35.00
1/14/22	TM	Revise and update spreadsheet on collections and review check from Daou;	.20	350.00	70.00
1/18/22	TM	Written correspondence with Lee Coddling re: fruit sale collections;	.10	350.00	35.00

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Date	Atty	Description	Hours	Rate	Amount
1/20/22	TM	Review weight tags from WarRoom and multiple written correspondences between Lori Ensley and various purchasers, update spreadsheet, calculate difference, written correspondence to Richard A. Marshack re: same;	.40	350.00	140.00
1/20/22	TM	Review weight tag for Corbett Vineyards and update spreadsheet;	.10	350.00	35.00
1/20/22	TM	Review multiple written correspondences between Lori Ensley, Lee Codding, and Center of Effort persons re: collection of fruit a/r;	.30	350.00	105.00
1/21/22	LB	Review documents related to appraisals and grape agreements (.20); Conference with Tinho Mang re: cataloging same (.10);	.30	260.00	78.00
1/21/22	TM	Written correspondence with Michael Gomez re: request for accounting of grape proceeds;	.10	350.00	35.00
1/24/22	TM	Telephone conference with Richard A. Marshack, Lori Ensley, and Lee Codding re: grape sales and collections;	.50	350.00	175.00
1/24/22	TM	Review weight tags from JAM and remittance checks from WarRoom and San Antonio/Riboli, written correspondence with Lori Ensley re: follow-up backup documentation;	.30	350.00	105.00
1/24/22	TM	Multiple written correspondences to Michael Gomez re: requested information on harvest and collections;	.20	350.00	70.00
1/25/22	TM	Written correspondence with Lori Ensley re: collections;	.10	350.00	35.00
1/25/22	TM	Written correspondence with Nick Elliott from Nicora Wines re: nonpayment and debt owed to grape purchaser;	.20	350.00	70.00
1/25/22	TM	Review written correspondences between JAM representative and trustee re: collections;	.10	350.00	35.00
1/25/22	TM	Telephone conference with Richard A. Marshack re: collections;	.30	350.00	105.00
1/26/22	TM	Written correspondence with Lee Codding re: demand for payment on requested reimbursements;	.10	350.00	35.00
1/27/22	TM	Review and summarize invoices and payment proofs from Codding for reimbursements, draft detailed written correspondence to Lee Codding re: analysis and response on behalf of trustee;	2.50	350.00	875.00
2/03/22	TM	Telephone conference with Michael Gomez re: demand from Riboli to extend foreclosure date and discussion of collections to date;	.50	350.00	175.00
2/14/22	TM	Multiple written correspondences with Pam Kraus and Lori Ensley re: collections issues;	.20	350.00	70.00
2/15/22	TM	Multiple written correspondences with Pam Kraus and Lori Ensley re: collections issues;	.20	350.00	70.00

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Date	Atty	Description	Hours	Rate	Amount
2/15/22	TM	Telephone conference with Richard A. Marshack and Lori Ensley re: collections issues and reconciling payments, discussion of possible litigation claims;	1.30	350.00	455.00
2/24/22	TM	Revise and update response letter to Codding to incorporate response to February 17 letter;	.50	350.00	175.00
2/24/22	TM	Written correspondence with Kevin Otus re: basis for well driller claim for payment when invoices do not show any work performed;	.10	350.00	35.00
2/25/22	TM	Review final payment invoices and backup letters from Daou and update working sheet accordingly;	.20	350.00	70.00
2/25/22	TM	Written correspondence to Michael Gomez re: explanation of Daou payment and update on collections projections;	.10	350.00	35.00
3/04/22	KAT	E-mail correspondence with Tinho Mang re: rejection of leases and deadlines (.20);	.20	550.00	110.00
3/04/22	TM	Written correspondence with Kristine A. Thagard and Layla Buchanan re: filing of motion to extend executory contract deadline;	.10	350.00	35.00
3/09/22	TM	Telephone conference with Charity Doherty from Wayne Cooper Ag Services re: nonpayment of invoice incurred as a result of water well testing on Live Oak site;	.20	350.00	70.00
3/17/22	TM	Review grape purchase contract and multiple written correspondences with representatives from JAM re: reissuance of check;	.40	350.00	140.00
3/22/22	TM	Telephone conference with Richard A. Marshack and Bill Tolar re: unpaid invoices from laborers and requesting information on unpaid farming expenses, full list of brokered grape purchases;	.50	350.00	175.00
3/23/22	TM	Telephone conference with Eufenia Nevarez re: unpaid invoices and background of dispute with farm laborer;	.50	350.00	175.00
3/28/22	TM	Review check received from JaM Cellers and update collections spreadsheet;	.10	350.00	35.00
<b>Sub-Total Fees:</b>			<b>51.30</b>		<b>\$ 17,980.00</b>

4 Case Administration

Date	Atty	Description	Hours	Rate	Amount
6/17/21	DEH	Telephone conference with Richard A. Marshack re: status (No Charge);	.20	650.00	N/C

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Date	Atty	Description	Hours	Rate	Amount
6/17/21	DAW	Multiple conference calls with Richard A. Marshack re: strategy moving forward (.40); Conference call with Lori Ensley re: inventory of the personal property assets (.10);	.50	490.00	245.00
6/18/21	DAW	Conference with Trustee re: strategy moving forward on the insurance and the lease issue;	.30	490.00	147.00
6/22/21	LB	Multiple conferences with Tinho Mang, Pam Kraus and/or David A. Wood re: status of case and preparation of operate motion and motion to continue insurance policy (No Charge);	.50	260.00	N/C
6/22/21	DAW	Multiple lengthy conference calls with Trustee and Lori Ensley re: instructions for Lori to go inventory all FFE and personal property assets for Rabbit Ridge tomorrow;	.80	490.00	392.00
7/27/21	TM	Detailed written correspondence and analysis to Richard A. Marshack re: discussion with Reed Waddell and Farm Credit's demands, list of outstanding case items;	.40	350.00	140.00
8/02/21	TM	Telephone conference with Pam Kraus re: status of procuring separate insurance for trustee;	.10	350.00	35.00
8/16/21	TM	Telephone conference with David A. Wood re: status update (No Charge);	.20	350.00	N/C
8/19/21	TM	Brief telephone conference with Richard A. Marshack re: discussion of outstanding issues (No Charge);	.10	350.00	N/C
8/20/21	TM	Telephone conference with D. Edward Hays re: hearing coverage for August 30 hearings and case status (No Charge);	.10	350.00	N/C
8/24/21	TM	Multiple written correspondences with Richard A. Marshack re: case status and administration;	.20	350.00	70.00
9/06/21	DEH	Telephone conference with Richard A. Marshack re: case status (No Charge);	.20	650.00	N/C
9/08/21	DAW	Conference with Trustee re: status of case and ongoing negotiations with prospective buyers (No Charge);	.30	490.00	N/C
9/09/21	TM	Detailed written correspondence to Richard A. Marshack and Kevin Otus upon request by Richard A. Marshack for detailed case update;	.30	350.00	105.00
9/22/21	TM	Telephone conference with Richard A. Marshack re: case status and PSA (No Charge);	.10	350.00	N/C
10/04/21	DAW	Conference with Trustee re: strategy moving forward;	.30	490.00	147.00
10/11/21	TM	Telephone conference with Richard A. Marshack re: revisions to carve out agreement and status of sale (No Charge);	.20	350.00	N/C
11/11/21	DAW	Conference with Trustee re: status of case and strategy moving forward;	.20	490.00	98.00



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Date	Atty	Description	Hours	Rate	Amount
11/22/21	TM	Telephone conference with Richard A. Marshack re: revisions to subordination stipulation and preparation for hearing on Chapter 11 administrative claim allowance;	.40	350.00	140.00
12/06/21	TM	Written correspondence with Richard A. Marshack re: outstanding case issues and administration;	.10	350.00	35.00
12/22/21	TM	Telephone conference with Richard A. Marshack re: case developments and liquidation of properties as agreed by bank and Coddling;	.20	350.00	70.00
1/27/22	TM	Telephone conference with Pam Kraus re: possible nonpayment of insurance by Lee Coddling;	.20	350.00	70.00
2/03/22	TM	Telephone conference with Pam Kraus and written correspondence to Pam Kraus re: approval for cashier's check based on criminal nonpayment of vendor;	.30	350.00	105.00
2/16/22	DEH	[REDACTED]	.60	650.00	390.00
2/16/22	TM	[REDACTED]	3.50	350.00	1,225.00
2/17/22	TM	[REDACTED];	.10	350.00	35.00
2/18/22	TM	[REDACTED]	.10	350.00	35.00
2/28/22	TM	Telephone conference with Richard A. Marshack re: status of sale negotiations and litigation options against Coddling (No Charge);	.30	350.00	N/C
3/03/22	CVH	Conference with the Trustee re: case status (.10) (No Charge);	.10	490.00	N/C
3/03/22	TM	Conference with Kristine A. Thagard re: sale and litigation issues (No Charge);	.30	350.00	N/C
3/16/22	TM	Telephone conference with Pam Kraus re: segregating sale proceeds (No Charge);	.50	350.00	N/C
3/18/22	LB	Conference with Tinho Mang re: preparation of notice to professionals and hearing on disbursement motion (.10); Conference call with Court clerk re: same (.10); Review and finalize notice (.20); (No Charge)	.40	260.00	N/C
3/21/22	TM	Review and comment allocation of funds for Form 1+2 with Pam Kraus;	.10	350.00	35.00
3/25/22	TM	Telephone conference with Richard A. Marshack and Pam Kraus re: negotiations with bank and distribution issues, payment of creditor claims (No Charge);	.50	350.00	N/C
<b>Sub-Total Fees:</b>			<b>12.70</b>		<b>\$ 3,519.00</b>



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5 Claims Administration and Objections

Date	Atty	Description	Hours	Rate	Amount
7/19/21	DAW	Review and analyze multiple e-mail correspondence from Pam Kraus and Tinho Mang re: Chapter 11 admin claims bar date in light of the 1019 report;	.20	490.00	98.00
7/19/21	TM	Written correspondence with Pam Kraus re: setting administrative claims bar date;	.10	350.00	35.00
8/04/21	TM	Review administrative priority proof of claim filed on behalf of Adler Belmont Group and written correspondence to Paul Ready re: same;	.20	350.00	70.00
8/06/21	LB	Conference with Tinho Mang re: preparation of motion to set chapter 11 administrative claims bar date (.10); Review case file (.10); Draft motion and declaration of Richard A. Marshack in support of same (.60); Draft notice of claims bar date (.20);	1.00	260.00	260.00
8/06/21	TM	Draft and revise motion for Chapter 11 administrative claims bar date;	1.20	350.00	420.00
8/09/21	LB	Conference with Tinho Mang re: revisions to claims bar date motion;	.10	260.00	26.00
8/09/21	TM	Draft and revise notice of motion to set administrative claims bar date;	.10	350.00	35.00
9/02/21	LB	Conference with Tinho Mang re: preparation of declaration re no hearing and proposed order on motion for administrative bar date (.10); Review case file (.10); Draft declaration in support of motion for administrative bar date (.20); Draft proposed order re: same (.30);	.70	260.00	182.00
9/02/21	TM	Draft and revise declaration and order re: Chapter 11 administrative claims bar date;	.10	350.00	35.00
9/03/21	LB	Conference with Tinho Mang re: preparation of notice of administrative bar date (.10); Draft notice of administrative bar date (.30); Draft correspondence to Kathleen Frederick re: scope of administrative and post-petition creditors (.10);	.50	260.00	130.00
9/03/21	TM	Draft and revise notice of administrative claims bar date and written correspondence with staff re: service;	.30	350.00	105.00
9/07/21	LB	Review and revise notice of administrative claims bar date (.20); Conference with Tinho Mang re: same (.10);	.30	260.00	78.00
9/08/21	LB	Conference with Tinho Mang re: revisions to notice of bar date (.10); Review and finalize notice of administrative bar date (.20);	.30	260.00	78.00
11/22/21	TM	Preparation for and appearance at hearing on allowance of Chapter 11 administrative claims;	.50	350.00	175.00
11/22/21	TM	Review lodged order for Adler Belmont group;	.10	350.00	35.00

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Richard Marshack, Trustee  
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Date	Atty	Description	Hours	Rate	Amount
3/28/22	TM	Review unpaid farm labor invoices and written correspondence with Eufemia Nevarez re: calculation of interest;	.40	350.00	140.00
3/28/22	TM	Written correspondence with Juan Nevarez re: clarifying questions on invoices from Nevarez Farm Labor;	.20	350.00	70.00
<b>Sub-Total Fees:</b>			<b>6.30</b>		<b>\$ 1,972.00</b>

7 Fee/Employment Applications

Date	Atty	Description	Hours	Rate	Amount
7/06/21	DAW	Review and respond to e-mail correspondence from Pam Kraus re: employment application for Bicher and Associates;	.10	490.00	49.00
7/08/21	LB	Conference with David A. Wood re: preparation of application to employ Bicher & Associates as field agent (.10); Draft application to employ and declaration of Lori Ensley re: same (.50);	.60	260.00	156.00
7/08/21	TM	Draft employment application for firm;	1.00	350.00	350.00
7/09/21	LB	Draft notice of application to employ Bicher & Associates as field agent;	.20	260.00	52.00
7/09/21	DAW	Draft and revise application to employ Lori Ensley;	.50	490.00	245.00
7/09/21	DAW	Draft and revise Marshack Hays employment application;	.60	490.00	294.00
7/13/21	TM	Telephone conference with David A. Wood re: preparation of Onyx/Hilco employment application;	.10	350.00	35.00
7/13/21	TM	Draft employment and compensation application for Onyx and Hilco;	2.30	350.00	805.00
7/14/21	TM	Telephone conference with Richard A. Marshack re: clarification and discussion of proposed terms of joint real estate agent employment;	.60	350.00	210.00
7/14/21	TM	Further telephone conference with Richard A. Marshack re: employment of asset protection consultant and revision of employment application for real estate professionals;	.30	350.00	105.00
7/14/21	TM	Revise and supplement application to jointly employ brokers Onyx and Hilco per Richard A. Marshack comments;	1.40	350.00	490.00
7/14/21	TM	Written correspondence to Kevin Otus and Jeff Azuse re: draft employment application for review and supplement;	.20	350.00	70.00

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Date	Atty	Description	Hours	Rate	Amount
7/15/21	LB	Conference with D. Edward Hays re: preparation of employment application (.10); Review and revise employment application and declaration of D. Edward Hays (.20); Review and revise notice of application (.10);	.40	260.00	104.00
7/15/21	LB	Conference with Tinho Mang re: revisions to application to employ Bicher & Associates (.10); Review and revise application and declaration of Lori Ensley re: same (.20);	.30	260.00	78.00
7/15/21	TM	Review proposed revisions to broker employment application by Hilco general counsel and multiple written correspondences with brokers re: no approval of compensation without 330 review;	.50	350.00	175.00
7/15/21	TM	Draft and revise notice of Marshack Hays employment application;	.10	350.00	35.00
7/15/21	TM	Telephone conference with Richard A. Marshack re: disagreement from brokers for terms of compensation and employment under Section 328, discussion of turnover motion, possibility of agreement for sale budget and distributions from Farm Credit;	.60	350.00	210.00
7/15/21	TM	Multiple telephone conferences with Richard A. Marshack and Kevin Otus re: negotiation of terms for Onyx employment and concerns with amount and reasonableness of compensation requested by brokers;	.20	350.00	70.00
7/15/21	TM	Multiple written correspondences with Hilco and Onyx re: revision to statutory predicate for compensation and employment, incorporate proposed revisions, further revise joint employment application per Richard A. Marshack comments;	1.10	350.00	385.00
7/16/21	CM	Revise and supplement application by chapter 7 trustee to jointly employ Onyx Asset Advisors, LLC and Hilco Real Estate as marketing and sale agent for the estate; acceptance and modification of prior employment and compensation terms for Hilco Real Estate, LLC in support (.10);	.10	260.00	26.00
7/16/21	CM	Revise and finalize application by chapter 7 trustee to jointly employ Onyx Asset Advisors, LLC and Hilco Real Estate as marketing and sale agent for the estate; acceptance and modification of prior employment and compensation terms for Hilco Real Estate, LLC in support and notice of application (.70);	.70	260.00	182.00
7/16/21	LB	Conference with Tinho Mang re: preparation of application to employ Onyx Assets (.10); Review and revise application and preparation of evidence in support of declarations of Kevin Otus and Sarah Baker (.30); Review and revise notice of application (.10);	.50	260.00	130.00
7/16/21	DAW	Review and analyze 10+ e-mail correspondence from Tinho Mang, Hilco, Trustee, and Onyx re: revisions to employment application and finalization for filing (No Charge);	.30	490.00	N/C

MARSHACK HAYS LLP

Richard Marshack, Trustee  
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Date	Atty	Description	Hours	Rate	Amount
7/16/21	TM	Telephone conference with Richard A. Marshack and multiple written correspondences with Onyx re: final revisions to joint employment application;	.20	350.00	70.00
7/16/21	TM	Draft and revise notice of employment application for Onyx and Hilco;	.10	350.00	35.00
7/21/21	LB	Review and respond to correspondence from Lori Ensley re: revisions to employment application (.10); Review and revise application and declaration of Lori Ensley (.20);	.30	260.00	78.00
8/02/21	LB	Conference with Tinho Mang re: revisions to Lori Ensley employment application (.10); Review and revise application and declaration of Lori Ensley (.10); Correspondence to Lori Ensley re: same (.10);	.30	260.00	78.00
8/02/21	LB	Conference with Tinho Mang re: preparation of notice of hearing re: employment of broker (.10); Review case file (.10); Draft notice of hearing re: terms of previous stipulation with secured creditor (.30);	.50	260.00	130.00
8/02/21	TM	Revise employment application for field agent and telephone conference with Layla Buchanan re: same;	.40	350.00	140.00
8/02/21	TM	Draft and revise notice of joint employment application for Hilco and Onyx;	.10	350.00	35.00
8/03/21	LB	Conference with Tinho Mang re: preparation of declaration re: no request for hearing on firm employment application (.10); Review case file (.10); Draft declaration re: same (.20); Draft proposed order re: same (.20);	.60	260.00	156.00
8/03/21	TM	Draft and revise declaration and order for Marshack Hays employment;	.10	350.00	35.00
8/31/21	LB	Draft order on application to employ Onyx and Hilco (.20);	.20	260.00	52.00
9/02/21	LB	Conference with Tinho Mang re: preparation of orders on hearings re: relief from stay, employment and operation of farm (.10); Review and finalize order to employ Onyx and Hilco (.10);	.20	260.00	52.00
9/07/21	TM	Review entered broker employment order and written correspondence to brokers re: copy of same;	.20	350.00	70.00
9/27/21	LB	Conference with David A. Wood re: preparation of declaration re employment of field agent (.10); Review case file (.10); Draft declaration re: no request for hearing (.20); Draft proposed order re: same (.20);	.60	260.00	156.00
9/27/21	DAW	Conference call with Lori Ensley re: status of their employment order (.10); Conference call with Pam Kraus re: same (.10);	.20	490.00	98.00
9/29/21	TM	Draft and revise proposed order granting field agent employment;	.10	350.00	35.00
3/16/22	DAW	Review and respond to multiple e-mail correspondence from Trustee and Tinho Mang re: 45 day notice in light of Live Oak closing and potential sale of the San Marcos and Texas Property;	.20	490.00	98.00

MARSHACK HAYS LLP

Richard Marshack, Trustee  
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Date	Atty	Description	Hours	Rate	Amount
3/25/22	LB	Conference with Tinho Mang re: preparation of fee application (.10); Conference with Marshack Hays re: status of invoices for preparation of same (.10); (No Charge)	.20	260.00	N/C
3/31/22	LB	Draft supplemental notice of hearing re: fee applications;	.10	260.00	26.00
<b>Sub-Total Fees:</b>			<b>17.30</b>		<b>\$ 5,600.00</b>

8 Fee/Employment Objections

Date	Atty	Description	Hours	Rate	Amount
9/30/21	TM	Telephone conference with Richard A. Marshack and M. Jonathan Hayes re: possible objection and disgorgement of preconversion security retainer;	.30	350.00	105.00
9/30/21	TM	Review final fee application for Resnik Hayes for objection, research re: disgorgement of security retainer and review original employment application for lien provision;	1.40	350.00	490.00
11/08/21	TM	Review Farm Credit opposition to interim fee award for Chapter 11 DIP counsel;	.10	350.00	35.00
11/08/21	TM	Draft stipulation to extend time to file response to Resnik Hayes fee app;	.20	350.00	70.00
11/08/21	TM	Telephone conference with Richard A. Marshack and M. Jonathan Hayes re: response to Chapter 11 administrative claim;	.10	350.00	35.00
11/08/21	TM	Telephone conferences with D. Edward Hays and Roksana Moradi- Brovia re: extension of deadline to respond to Chapter 11 administrative claim;	.30	350.00	105.00
11/09/21	TM	Draft and research written correspondence to Roksana Moradi-Brovia re: disgorgement of retainer without attorney lien and arguments;	.40	350.00	140.00
11/10/21	TM	Draft stipulation for reservation of rights re: Chapter 11 fee application by Resnik Hayes;	.30	350.00	105.00
11/11/21	LB	Conference with Tinho Mang re: preparation of stipulation re: reservation of rights by chapter 7 Trustee re: response to Resnik Hayes Moradi employment application (.10); Review and finalize stipulation (.10);	.20	260.00	52.00
11/19/21	LB	Conference with Tinho Mang re: hearings on chapter 11 administrative fees (.10); Review case file (.10); Arrange telephonic appearance at hearings (.10); Preparation of materials for hearings (.10);	.40	260.00	104.00

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Date	Atty	Description	Hours	Rate	Amount
11/22/21	TM	Review and revise proposed order approving final fees for RHM;	.20	350.00	70.00
Sub-Total Fees:			3.90		\$ 1,311.00

**TOTAL FEES**

**\$ 266,530.00**

**EXHIBIT 3**

MARSHACK HAYS LLP

Richard Marshack, Trustee  
Client-Matter# 1015-146

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**FEE RECAP BY TASK CODE**

<b>Task</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
.1	SLO Property Tax negotiations	14.20	7,290.00
1	Asset Analysis and Recovery	111.70	45,552.00
10	Litigation	112.80	41,930.00
11	Meetings of Creditors	18.00	6,597.00
13	Relief from Stay Proceedings	20.60	6,444.00
2	Asset Disposition	268.50	128,335.00
3	Business Operations	51.30	17,980.00
4	Case Administration	12.70	3,519.00
5	Claims Administration and Objections	6.30	1,972.00
7	Fee/Employment Applications	17.30	5,600.00
8	Fee/Employment Objections	3.90	1,311.00
	Sub-Total of Fees:	637.30	\$ 266,530.00



MARSHACK HAYS LLP

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**FEE RECAP BY ATTORNEY**

Name	Atty	Staff Level	N/C Hours	Billed Hours	Rate	Billed Amount
Chanel Mendoza	CM	Paralegal	.00	6.70	260.00	1,742.00
Layla Buchanan	LB	Paralegal	1.40	47.00	260.00	12,220.00
Cynthia Bastida	CB	Paralegal	.00	.60	260.00	156.00
Pamela Kraus	PK	Paralegal	.00	.70	280.00	196.00
Tinho Mang	TM	Associate	10.10	266.00	350.00	93,100.00
Chad V. Haes	CVH	Partner	1.20	.20	490.00	98.00
David A. Wood	DAW	Partner	8.00	67.70	490.00	33,173.00
Kristine A. Thagard	KAT	Of Counsel	.00	217.70	550.00	119,735.00
D. Edward Hays	DEH	Partner	.60	9.40	650.00	6,110.00
<b>Total</b>			<b>21.30</b>	<b>616.00</b>		<b>\$ 266,530.00</b>

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**FEE RECAP BY MONTH**

**D. Edward Hays**

07/2021	2.10	1,365.00
08/2021	2.30	1,495.00
09/2021	.20	130.00
12/2021	.40	260.00
02/2022	1.00	650.00
03/2022	3.40	2,210.00
<b>Subtotal for D. Edward Hays</b>	<b>9.40</b>	<b>\$ 6,110.00</b>

**Chad V. Haes**

12/2021	.20	98.00
<b>Subtotal for Chad V. Haes</b>	<b>.20</b>	<b>\$ 98.00</b>

**David A. Wood**

06/2021	36.00	17,640.00
07/2021	23.30	11,417.00
08/2021	2.60	1,274.00
09/2021	1.30	637.00
10/2021	.90	441.00
11/2021	.40	196.00
12/2021	.60	294.00
01/2022	.50	245.00
02/2022	.50	245.00
03/2022	1.60	784.00
<b>Subtotal for David A. Wood</b>	<b>67.70</b>	<b>\$ 33,173.00</b>

**Kristine A. Thagard**

06/2021	9.60	5,280.00
07/2021	11.80	6,490.00
08/2021	9.80	5,390.00
09/2021	58.60	32,230.00
10/2021	20.70	11,385.00
11/2021	8.10	4,455.00
12/2021	13.10	7,205.00
01/2022	26.40	14,520.00
02/2022	28.00	15,400.00
03/2022	31.60	17,380.00
<b>Subtotal for Kristine A. Thagard</b>	<b>217.70</b>	<b>\$ 119,735.00</b>

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**Tinho Mang**

06/2021	6.80	2,380.00
07/2021	39.30	13,755.00
08/2021	61.80	21,630.00
09/2021	12.30	4,305.00
10/2021	13.30	4,655.00
11/2021	20.80	7,280.00
12/2021	32.30	11,305.00
01/2022	27.50	9,625.00
02/2022	26.10	9,135.00
03/2022	25.80	9,030.00
<b>Subtotal for Tinho Mang</b>	<b>266.00</b>	<b>\$ 93,100.00</b>

**Pamela Kraus**

07/2021	.70	196.00
<b>Subtotal for Pamela Kraus</b>	<b>.70</b>	<b>\$ 196.00</b>

**Chanel Mendoza**

07/2021	2.30	598.00
09/2021	1.60	416.00
10/2021	.70	182.00
11/2021	1.90	494.00
02/2022	.20	52.00
<b>Subtotal for Chanel Mendoza</b>	<b>6.70</b>	<b>\$ 1,742.00</b>

**Layla Buchanan**

07/2021	7.80	2,028.00
08/2021	9.00	2,340.00
09/2021	3.80	988.00
10/2021	6.20	1,612.00
11/2021	5.10	1,326.00
12/2021	1.10	286.00
01/2022	7.20	1,872.00
02/2022	2.00	520.00
03/2022	4.80	1,248.00
<b>Subtotal for Layla Buchanan</b>	<b>47.00</b>	<b>\$ 12,220.00</b>

**Cynthia Bastida**

07/2021	.60	156.00
<b>Subtotal for Cynthia Bastida</b>	<b>.60</b>	<b>\$ 156.00</b>

**EXHIBIT 4**

MARSHACK HAYS LLP

Richard Marshack, Trustee  
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**DISBURSEMENTS**

E101 Copying

Date	Description	Amount
7/15/21	Document Copies re: application to employ Marshack Hays LLP as general counsel, notice of application	9.70
7/16/21	Document Copies re: application to employ Onyx and Hilco, notice of application, motion to extend 365 deadline to assume or reject contracts, notice of motion (including judge copies)	55.20
7/20/21	Document Copies re: stipulation to modify responsive deadlines for FCW stay relief motion, opposition to stay relief motion. Judge's copies included	50.40
7/27/21	Document Copies re: stipulation to continue hearing on Farm Credit's stay relief motion	.50
7/30/21	Document Copies re: letter requesting production of documents	.20
8/02/21	Document Copies re: motion for turnover of estate property, notice of motion, notice of hearing re application to employ Onyx and Hilco	156.30
8/03/21	Document Copies re notice of hearing re application to employ Onyx and Hilco, motion for turnover of estate property, notice of motion for turnover of estate property, opposition to stay relief motion. Judge's copies included	71.20
8/04/21	Document Copies re: notice of lodgment, judge copy included	1.40
8/06/21	Document Copies re: application to employ Bicher & Associates, notice of application	6.70
8/09/21	Document Copies re: served motion to set administrative bar date, notice of motion set administrative bar date	5.60
8/09/21	Document Copies re: stipulation for turnover of real property located at 1172 San Marcos Road Paso Robles, motion to approve farm operator agreement, supplement to motion for order compelling turnover of estate property	57.00
8/10/21	Document Copies re: Judge's copies - notice of motion to operate, motion to operate, served supplement to motion for turnover, motion to set administrative bar date,	11.30
8/24/21	Document Copies re: served reply to motion for turnover, Judge and US Trustee copy included	17.90
8/26/21	Document Copies re: hearing notebook for August 3 , 2021 for Tinho Mang	112.40
8/27/21	Document Copies re: request for judicial notice in support of motion for order compelling turnover of estate property	2.10
8/30/21	Document Copies re: RFJN in support of supplement to turnover motion, judge copy included	4.40
8/31/21	Document Copies re: served - stipulation for turnover, judge copy included	6.00
9/03/21	Document Copies re: Declaration that no party requested a hearing on motion, Judge copy included	3.60
9/08/21	Document Copies re: served notice of administrative bar date, judge copy included	16.20
9/29/21	Document Copies re: declaration that no party requested a hearing on motion re application to employ Bicher & Associates	2.80
9/30/21	Document Copies re: Judge copy - Declaration that no party requested a hearing on motion	2.80
10/05/21	Document Copies re: motion to authorize Well Drilling, notice of motion to authorize Well Drilling, Judge's copies included	17.60
11/09/21	Document Copies re: stipulation to extend deadline to file response to final application (including judge copy)	.80
11/11/21	Document Copies re: stipulation re reservation of rights by trustee for response or opposition to Resnik Hayes moradi application (including judge copy)	1.00

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11/11/21	Document Copies re: notice motion to extend 365 deadline to assume or reject contracts, second motion to extend 365 deadline to assume or reject contracts. Judge copy included	22.50
12/20/21	Document Copies re: chapter 7 trustee's motion to approve compromise and subordination agreement with Farm Credit West FCLA, notice of motion (including judge copies)	55.10
1/20/22	Document Copies re: notice of motion to approve sale re Live Oak Property	.40
1/20/22	Document Copies re: Judge copies - Notice of motion for order authorizing sale of real property. Motion for order authorizing sale of real property.	35.10
1/31/22	Document Copies re: stipulation between chapter 7 trustee and secured creditor Farm Credit West FCLA re voluntary subordination of lien for sale of 2380 Live Oak Road Paso Robles CA	18.30
2/01/22	Document Copies re: Judge copy - stipulation between chapter 7 trustee and secured creditor Farm Credit West	1.30
2/03/22	Document Copies re: request for 341a Audio - chapter 11 on 11-20-20	.20
2/23/22	Electronic copying re: letter from Lee Coddling re request for payments and possible payment plan	.20
2/25/22	Document Copies re: letter to Nick Quincey re San Marcos Property	.30
3/01/22	Document Copies re: findings of fact and conclusions of law re order granting trustee's motion for order authorizing sale of real property, exhibit A to findings	382.50
3/18/22	Document Copies re: notice to retained professionals re hearing on fee applications	.40
<b>Sub-Total of Disbursements</b>		<b>\$ 1,129.40</b>

E102 Outside Printing

Date	Description	Amount
1/20/22	Served motion to approve sale re: Live Oak Property and notice of motion to approve sale re: Live Oak Property on 01/19/22 - Digicopy, Inc.	1,500.06
<b>Sub-Total of Disbursements</b>		<b>\$ 1,500.06</b>

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E105 Telephonic Court Appearance

Date	Description	Amount
8/03/21	Telephonic court appearance with Honorable Mark S. Wallace on 08/03/21 - Tinho Mang - CourtCall, LLC	26.25
8/03/21	Telephonic court appearance with Honorable Mark S. Wallace on 08/05/21 - Tinho Mang - CourtCall, LLC	31.85
8/03/21	Telephonic court appearance with Honorable Mark S. Wallace on 08/10/21 - Tinho Mang - CourtCall, LLC	26.25
11/03/21	Telephonic court appearance with Honorable Mark S. Wallace on 10/20/21 - Kristine A. Thagard - CourtCall, LLC	26.25
11/03/21	Telephonic court appearance with Honorable Mark S. Wallace on 10/26/21 - Kristine A. Thagard - CourtCall, LLC	26.25
11/23/21	Telephonic court appearance with Honorable Mark S. Wallace on 11/23/21 - Tinho Mang - CourtCall, LLC	26.25
12/16/21	Telephonic court appearance with Honorable Mark S. Wallace on 12/13/21 - Tinho Mang - CourtCall, LLC	26.25
1/03/22	Telephonic court appearance with Honorable Mark S. Wallace on 01/11/22 - Tinho Mang - CourtCall, LLC	26.25
<b>Sub-Total of Disbursements</b>		<b>\$ 215.60</b>

E106 Online Research

Date	Description	Amount
7/01/21	Computer Research re: Pacer usage, June 2021	33.70
7/01/21	Computer Research re: LexisNexis usage, June 2021	108.08
8/01/21	Computer Research re: LexisNexis usage, July 2021	82.01
8/01/21	Computer Research re: Pacer usage, July 2021	22.80
9/01/21	Computer Research re: LexisNexis usage, August 2 21	151.21
9/01/21	Computer Research re: Pacer usage, August 2021	30.70
10/01/21	Computer Research re: Pacer usage, September 2021	10.70
10/01/21	Computer Research re: LexisNexis usage, September 2021	16.26
11/01/21	Computer Research re: LexisNexis usage, October 2 21	30.53
11/01/21	Computer Research re: Pacer usage, October 2021	.10
12/01/21	Computer Research re: Pacer usage, November 2021	.50
12/01/21	Computer Research re: LexisNexis usage, November 2021	3.04
1/01/22	Computer Research re: LexisNexis usage, December 2021	35.87
1/01/22	Computer Research re: Pacer usage, December 2021	4.00
1/01/22	Computer Research re: Pacer usage	3.20
2/01/22	Computer Research re: LexisNexis usage, January 2 22	69.47
2/01/22	Computer Research re: Pacer usage, January 2022	1.00
<b>Sub-Total of Disbursements</b>		<b>\$ 603.17</b>

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E107 Delivery Services/Messenger

Date	Description	Amount
7/31/21	Deliver opposition to stay relief motion filed by insurance broker, stipulation to continue to Honorable Mark S. Wallace/ Santa Ana, CA on 07/21/21 - Nationwide Legal, Inc.	7.50
7/31/21	Deliver stipulation to continue hearing on farm credit's stay relief motion and to specially set to Honorable Mark S. Wallace/ Santa Ana, CA on 07/28/21 - Nationwide Legal, Inc.	7.50
8/15/21	Deliver notice of hearings re application by chapter 7 .trustee to jointly employ Onyx Asset Advice to Honorable Mark S. Wallace/ Santa Ana, CA on 08/03/21 - Nationwide Legal, Inc	7.50
8/15/21	Deliver notice of lodgment of order in bankruptcy case re: title of motion, motion for relief to Honorable Mark S. Wallace/ Santa Ana, CA on 08/04/21 - Nationwide Legal, Inc	7.50
8/15/21	Deliver motion for order authorizing limited operation of debtor's business, notice of chapter 7 to Honorable Mark S. Wallace/ Santa Ana, CA on 08/10/21 - Nationwide Legal, Inc	7.50
8/31/21	Deliver reply in support of turnover motion for Live Oak Property to Honorable Mark S. Wallace in Santa Ana, CA on 08/24/21 - Nationwide Legal, Inc.	7.50
8/31/21	Deliver request for Judicial notice in support of supplement to Chapter 7 trustee's motion to Honorable Mark S. Wallace in Santa Ana, CA on 08/30/21 - Nationwide Legal, Inc.	7.50
8/31/21	Deliver stipulation for turnover of real property 2380 Live Oak Road, Paso Robles CA to Honorable Mark S. Wallace in Santa Ana, CA on 08/31/21 - Nationwide Legal, Inc.	7.50
9/15/21	Deliver declaration that no party requested a hearing on motion on 09/03/21 - Nationwide Legal, Inc.	7.50
9/30/21	Deliver notice of administrative claims bar date to Honorable Mark S. Wallace in Santa Ana, CA on 09/08/21 - Nationwide Legal, Inc.	7.50
9/30/21	Deliver declaration that no party requested a hearing on motion to Honorable Mark S. Wallace in Santa Ana, CA on 09/30/21 - Nationwide Legal, Inc.	7.50
10/15/21	Deliver notice of Chapter 7 trustee's motion for order authorizing Water Well Drilling on property to Honorable Mark S. Wallace/ Santa Ana, CA on 10/05/21 - Nationwide Legal, Inc.	7.50
10/15/21	Deliver notice of trustee's motion for order approving overbid procedures for the sale of property to CA Department of Tax and Fee Administration/ Los Angeles, CA on 10/06/21 - Nationwide Legal, Inc.	94.50
10/15/21	Deliver notice of trustee's motion for order approving overbid procedures for the sale of property to Capital One, National Association/ Sacramento, CA on 10/06/21 - Nationwide Legal, Inc.	94.50
10/15/21	Deliver notice of trustee's motion for order approving overbid procedures for the sale of property to Thomas K. Rackerby c/o Tom Prountzos, Esq./ San Francisco, CA on 10/06/21 - Nationwide Legal, Inc.	93.00
10/15/21	Deliver notice of trustee's motion for order approving overbid procedures for the sale of property to West Coast Wine Partners, LLC c/o Phillip H./ Santa Rosa, CA on 10/06/21 - Nationwide Legal, Inc.	340.00
10/15/21	Deliver notice of trustee's motion for order approving overbid procedures for the sale of property to Sunbelt Rentals, Inc./ Glendale, CA on 10/06/21 - Nationwide Legal, Inc.	105.00
10/15/21	Deliver and print notice of hearing to Honorable Wayne Johnson/ Riverside, CA on 10/01/21 - Nationwide Legal, Inc.	78.70
10/15/21	Deliver notice of trustee's motion for order approving overbid procedures for the sale of property to Bank of America, National Association/ Glendale, CA on 10/06/21 - Nationwide Legal, Inc.	109.50



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10/15/21	Delivery to notice of trustee's motion for order approving overbid procedures for the sale of property in San Francisco/ CA on 10/06/21 - Nationwide Legal, Inc.	83.00
11/15/21	Deliver stipulation to extend deadline to file response to final application to Honorable Mark S. Wallace/ Santa Ana, CA on 11/09/21 - Nationwide Legal, Inc.	7.50
11/15/21	Deliver stipulation re reservation of rights by chapter 7 trustee for response or opposition to Honorable Mark S. Wallace/ Santa Ana, CA on 11/12/21 - Nationwide Legal, Inc.	7.50
12/31/21	Deliver Chapter 7 trustee's motion to approve compromise and subordination agreement with Farm Cre to Honorable Mark S. Wallace on 12/21/21 - Nationwide Legal, Inc.	7.50
2/15/22	Deliver stipulation between chapter 7 trustee and secured creditor Farm Credit West to Honorable Mark S. Wallace/ Santa Ana, CA on 02/01/22 - Nationwide Legal, Inc.	7.50
2/15/22	Pick-up from UST office and deliver section 341(a) meeting of creditors audio recording request to Marshack Hays LLP/ Irvine, CA on 02/03/22 - Nationwide Legal, Inc.	26.00
2/15/22	Pick-up from UST office and deliver CD of 341(a) audio recording for Northern Holding to Marshack Hays LLP/ Irvine, CA on 02/10/22 - Nationwide Legal, Inc.	26.00
3/04/22	Federal Express to Antonia Delgado/Beverly Hills,CA on 03/04/22	10.69
<b>Sub-Total of Disbursements</b>		<b>\$ 1,180.89</b>

MARSHACK HAYS LLP

Richard Marshack, Trustee  
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E108 Postage

Date	Description	Amount
7/15/21	Postage re: application to employ Marshack Hays LLP as general counsel, notice of application	12.82
7/16/21	Postage re: application to employ Onyx and Hilco, notice of application, motion to extend 365 deadline to assume or reject contracts, notice of motion (including judge copies)	38.07
7/20/21	Postage re: stipulation to modify responsive deadlines for FCW stay relief motion, opposition to stay relief motion.	8.55
7/27/21	Postage re: stipulation to continue hearing on Farm Credit's stay relief motion	.65
7/30/21	Postage re: letter requesting production of documents	.51
8/02/21	Postage re: motion for turnover of estate property, notice of motion, notice of hearing re application to employ Onyx and Hilco	81.03
8/03/21	Postage re: opposition to stay relief motion filed by bankdirect	8.55
8/04/21	Postage re: notice of lodgment,	.51
8/06/21	Postage re: application to employ Bicher & Associates, notice of application	13.13
8/09/21	Postage re: served motion to set administrative bar date, notice of motion set administrative bar date	12.24
8/09/21	Postage re: stipulation for turnover of real property located at 1172 San Marcos Road Paso Robles, motion to approve farm operator agreement, supplement to motion for order compelling turnover of estate property	41.86
8/24/21	Postage re: served reply to motion for turnover, US Trustee copy included	5.20
8/27/21	Postage re: request for judicial notice in support of motion for order compelling turnover of estate property	1.40
8/30/21	Postage re: RFJN in support of supplement to turnover motion,	.51
8/31/21	Postage re: served - stipulation for turnover,	4.59
9/03/21	Postage re: Declaration that no party requested a hearing on motion,	.71
9/08/21	Postage re: served notice of administrative bar date	15.57
9/29/21	Postage re: declaration that no party requested a hearing on motion re application to employ Bicher & Associates	1.56
10/05/21	Postage re: motion to authorize Well Drilling, notice of motion to authorize Well Drilling,	2.76
11/09/21	Postage re: stipulation to extend deadline to file response to final application (including judge copy)	.53
11/11/21	Postage re: stipulation re reservation of rights by trustee for response or opposition to Resnik Hayes moradi application	.53
11/11/21	Postage re: notice motion to extend 365 deadline to assume or reject contracts, second motion to extend 365 deadline to assume or reject contracts.	14.85
12/20/21	Postage re: chapter 7 trustee's motion to approve compromise and subordination agreement with Farm Credit West FCLA, notice of motion (including judge copies)	28.45
1/20/22	Postage re: motion to approve sale re Live Oak Property, notice of motion	575.73
1/31/22	Postage re: stipulation between chapter 7 trustee and secured creditor Farm Credit West FCLA re voluntary subordination of lien for sale of 2380 Live Oak Road Paso Robles CA	32.33
2/25/22	Postage re: letter to Nick Quincey re San Marcos Property	.53
3/01/22	Postage re: findings of fact and conclusions of law re order granting trustee's motion for order authorizing sale of real property, exhibit A to findings	129.03
3/18/22	Postage re: notice to retained professionals re hearing on fee applications	.53
<b>Sub-Total of Disbursements</b>		<b>\$ 1,032.73</b>

MARSHACK HAYS LLP

Richard Marshack, Trustee  
Client-Matter# 1015-146

March 31, 2022  
Invoice # 13964

E109 Local Travel

Date	Description	Amount
7/27/21	Hotel charges for 07/27/21 - Richard A. Marshack	258.69
<b>Sub-Total of Disbursements</b>		<b>\$ 258.69</b>

E112 Court Fees

Date	Description	Amount
8/05/21	Obtain copy of documents from Secretary of State	13.00
9/30/21	Filing fee for sale motion at United States Bankruptcy Court	188.00
1/19/22	Filing fee for sale motion at United States Bankruptcy Court	188.00
<b>Sub-Total of Disbursements</b>		<b>\$ 389.00</b>

E115 Deposition Transcripts

Date	Description	Amount
2/22/22	eScribers, LLC re: 341(a) hearing 11/20/20	257.05
2/22/22	eScribers, LLC re: 341(a) hearing 02/08/22	349.20
<b>Sub-Total of Disbursements</b>		<b>\$ 606.25</b>

**CURRENT DISBURSEMENTS** **\$ 6,915.79**

**EXHIBIT 5**

MARSHACK HAYS LLP

Richard Marshack, Trustee  
Client-Matter# 1015-146

March 31, 2022  
Invoice # 13964

**DISBURSEMENT RECAP BY TASK CODE**

<b>Task</b>	<b>Description</b>	<b>Amount</b>
E101	Copying	1,129.40
E102	Outside Printing	1,500.06
E105	Telephonic Court Appearance	215.60
E106	Online Research	603.17
E107	Delivery Services/Messenger	1,180.89
E108	Postage	1,032.73
E109	Local Travel	258.69
E112	Court Fees	389.00
E115	Deposition Transcripts	606.25
	Sub-Total of Disbursements	\$ 6,915.79

**TOTAL CURRENT CHARGES** **\$ 273,445.79**

**EXHIBIT 6**

## **PARTNERS**

### **RICHARD A. MARSHACK**

Richard A. Marshack is a founding member of the firm of Marshack Hays LLP. He was born in Las Vegas, Nevada, June 21, 1958. He graduated from University of California at Irvine in 1979 with a Bachelor of Arts degree and California Western School of Law (J.D. Magna Cum Laude, 1982). Recipient, American Jurisprudence Award: Agency and Partnership. Staff Writer, 1980-1981 and Lead Articles Editor, 1981-1982 California Western Law Review. He was admitted to the California Bar in 1982 and the U. S. District Court, Central and Southern Districts of California and U. S. Court of Appeals, Ninth Circuit, 1984.

Mr. Marshack was Law Clerk to the Honorable Folger Johnson, Chief Judge, United States Bankruptcy Court, District of Oregon, 1982-1984, and an Adjunct Professor: Bankruptcy Law, Western States University College of Law, Bankruptcy Law, 1993; Bankruptcy Law, University of California, Irvine, 1985-1992.

Mr. Marshack has authored several articles, including: "The Toxic Claim: Using Bankruptcy Law to Limit Environmental Liabilities," California Bankruptcy Journal, Volume 19, Number 3, 1991; "Recent Developments Under Section 546 of the Bankruptcy Code," Tactics for Unsecured Creditors of Bankrupt Debtors," California Lawyer 21, August, 1984; "Adequate Protection for the Unsecured Creditor Under the Bankruptcy Code", Commercial Law Journal 621, December 1983; "Recent Developments for Reclaiming Goods Under the Bankruptcy Code and the Uniform Commercial Code, "Uniform Commercial Code Law Journal 187, July, 1983; "Reclamation of Goods Under the Bankruptcy Code," Oregon Debtor-Creditor News Letter, I, July 1983; "*Sindell vs. Abbot Laboratories*: Is Market Share Liability the Best Remedy to the DES Controversy" California Western Law Review 143, 1981.

Memberships: Orange County Bankruptcy Forum, Director and President 1995-96; Orange County Bar Association (Commercial Law & Bankruptcy Section), Chairman, 1989; California State Bar Association; Commercial Law League of America; Los Angeles Bankruptcy Forum.

*Panel Bankruptcy Trustee for U.S. Bankruptcy Court, Central District of California, 1985 - Present.*

### **D. EDWARD HAYS**

D. Edward Hays, is a founding member of the firm of Marshack Hays LLP. He was born in Los Angeles, California. He graduated with honors from California State University at Fullerton in 1989 with a Bachelor of Arts degree in Business. He graduated from the University of Southern California Law Center in 1992 where he was a member of the Hale Moot Court Honors program. Mr. Hays was admitted to practice in 1992. Ed has been certified as a bankruptcy law specialist by the State Bar of California.

Mr. Hays currently serves on the Board of Directors for the following organizations: Legal Aid Society of Orange County; and University of Southern California Law School Annual Fund. He has previously served on the Board for the Cal State University Fullerton Alumni Association; and the Cal State University Fullerton Philanthropic Foundation. In 2004-2005, Mr. Hays served as the President of the Cal State Fullerton Alumni Association and was selected that year as a CSUF Volunteer of the Year. In 2004, Mr. Hays was the Chair of the Resolutions Committee for the Orange County Bar Association and has served as a delegate to the State Bar Conference on behalf of Orange County every year since 1995.

Ed focuses his practice on bankruptcy and litigation matters. In 2000 and 2017, he was the Chair of the Commercial Law & Bankruptcy Section of the Orange County Bar Association. He also has served as a Director or member of the following organizations: the Inland Empire Bankruptcy Forum; the Orange County Bankruptcy Forum; the William P. Gray Legion Lex American Inns of Court, the Federal Bar Association, and the Executive Council for the College of Business at Cal State Fullerton. In 1998 and 1999, Mr. Hays also served as a Judge Pro Tem for the Superior Court of the State of California, County of Los Angeles. Ed has been selected on numerous occasions to present continuing education lectures on various legal topics including bankruptcy, litigation, exemptions, and legal research. He also served on the Central District Task Force for Amendments to the Local Bankruptcy Rules.

In 2004, Ed won the State Bar 5k race and, in 2005 and 2006, was the runner-up. He also actively participates in endurance events completing full-distance Ironman Triathlons in 2000 and 2003; eight half-Ironman races between 1999 and 2016; and a 50- mile ultra-run in 2009; and multiple marathons across the world including New York, Los Angeles, Rome, St. George, and the Madison Valley in Montana.

Ed's published cases include: *In re Brace*, 9 Cal.5th 903 (Cal. Supreme Court 2020); *Jue v. Liu* (In re Liu), 611 B.R. 864 (9th Cir. BAP 2020); *In re Nolan*, \_\_ B.R. \_\_ (Bankr. C.D.Cal. 2020); *In re Roger*, 393 F.Supp.3d 940 (Distr. Cal. 2019); *Naylor v. Farrell* (In re Farrell), 610 B.R. 317 (Bankr. C.D.Cal. 2019); *Slaieh v. Simons*, 548 B.R. 28 (Distr. Cal. 2018); *Brace v. Speier*, 908 F.3d 531 (9th Cir. 2018); *Cal. Corr. Peace Officers Ass'n Ben. Trust Fund v. Corbett* (In re Corbett), 2017 U.S.Distr. Lexis 108925 (E.D.Cal. 2017), *Brace v. Speier* (In re Brace), 566 B.R. 13 (9th Cir. BAP 2017); *In re DRI Cos.*, 552 B.R. 195 (Bankr. C.D.Cal. 2016); *Stahl v. Whelan Elec., Inc.* (In re Modtech Holdings), 503 B.R. 737 (Bankr. C.D.Cal. 2013); *In re Cusimano*, 2013 WL 9736597 (Bankr. C.D.Cal. 2013); *In re Cass*, 476 B.R. 602 (Bankr. C.D. Cal. 2012); *In re Four Star Financial Services, Inc.*, 444 B.R. 428 (Bankr. C.D. Cal. 2011) *rev'd* 469 B.R. 30 (C.D. Cal. 2012); *In re Rinard*, 451 B.R. 12 (Bankr. C.D. Cal. 2011); *In re Dick Cepek*, 339 B.R. 730 (9th Cir. BAP 2006); *In re Dudley*, 249 F.3d 1170 (9th Cir. 2001); *In re Kim*, 257 B.R. 680 (9th Cir. BAP 2000); *In re Kuraishi*, 237 B.R. 172 (Bankr. C.D. Cal. 1999); *Blonder v. Cumberland Engineering*, (1999) 71 Cal.App.4th 1057, 84 Cal.Rptr.2d 216; *In re Metz*, 225 B.R. 173 (9th Cir. BAP 1998); *In re National Environmental Waste Corporation*, 191 B.R. 832 (Bankr. C.D. Cal. 1996) *aff'd* 129 F.3d 1052 (9th Cir. 1997); *In re Turner*, 186 B.R. 108 (9th Cir. BAP 1995); and *In re Continental Capital & Credit*, 158 B.R. 828 (Bankr. C.D. Cal. 1993).



Ed and his wife, Sarah Cate Hays, have also co-authored the following law review articles published in the California Bankruptcy Journal:

- *The Client Without a Remedy and the Windfall Estate – The Case for Debtor Ownership of Malpractice Claims Against Bankruptcy Counsel* (32 Cal. Bank. J. 65 (2012));
- *The Same Love – Marriage Equality in Bankruptcy Post-DOMA and the Evolving Rights of Registered Domestic Partners* (33 Cal. Bank. J. 49 (2014)); and
- *Good Help is Hard to Fund: The Problem of Earned Upon Receipt Retainers and Pre-Funded Litigation in Bankruptcy* (33 Cal. Bankr. J. 421 (2016)).

## **CHAD V. HAES**

Chad V. Haes focuses his practice areas include bankruptcy litigation, business and civil litigation, lender liability, and creditors' rights. Mr. Haes' litigation experience includes representing institutional lenders in actions related to lien priority and wrongful foreclosure, prosecuting and enforcing mechanic's liens, seeking unlawful detainer judgments on behalf of secured lenders and representing creditors, debtors and trustees in the bankruptcy context.

Mr. Haes is a California native who earned his Bachelor of Arts degree from Azusa Pacific University in 2004 and his law degree from Southwestern Law School in 2008. Prior to joining Marshack Hays, Mr. Haes served a two-year term as the judicial law clerk to the Honorable Meredith A. Jury of the United States Bankruptcy Court for the Central District of California, Riverside Division. Mr. Haes also externed for Honorable Samuel L. Bufford of the United States Bankruptcy Court for the Central District of California, Los Angeles Division.

While in law school, Mr. Haes was a member of the Moot Court Honors Program and the recipient of the John J. Schumacher full-tuition scholarship, the Equal Justice America fellowship, the Wiley W. Manuel Award for Pro Bono Legal Services and the CALI Excellence Award for Constitutional Law. Mr. Haes was also selected as a finalist oralist and finalist writer in the Southwestern First-Year Intramural Moot Court Competition and a finalist oralist in the Rendigs National Products Liability Moot Court Competition.

## **DAVID A. WOOD**

David A. Wood focuses his practice areas include bankruptcy litigation, business and civil litigation, lender liability, and creditors' rights.

Mr. Wood earned his Bachelor of Arts degree from Biola University in 2003, where he graduated magna cum laude. Thereafter, Mr. Wood was a senior associate at Alfred Gobar Associates, a firm specializing in developing econometric modeling systems to evaluate land development opportunities, and the existence of economic blight. He earned his law degree from Chapman University School of Law in 2010, where he graduated in the top 6% of his class. Prior to joining Marshack Hays, Mr. Wood served a two-and-a-half year term as the judicial law clerk to the Honorable Erithe A. Smith of the United States Bankruptcy Court for the Central District of California, Santa Ana Division. Mr. Wood also externed for Honorable Theodor C. Albert of the United States Bankruptcy Court for the Central District of California, Santa Ana Division.

While in law school, Mr. Wood was a symposium editor for the Chapman Law Review and the recipient of the CALI Excellence Award for Immigration Law and Select Topics in American Law.

## **ATTORNEYS**

**KRISTINE A. THAGARD** focuses her practice on contract, construction, loan enforcement (including lender's right to insurance proceeds and guarantees), purchase and sale transactions, partnership dispute, toxic cleanup and environmental contamination, broker malfeasance, fiduciary duty (broker/agent, partnership and trust), and insurance (negotiation, bad faith, and declaratory relief). She has significant litigation experience in multi-party complex construction defect actions, all aspects of general/commercial liability defense (construction, product and premise liability), subrogation, and real estate (broker/agent, contract, title, contract and fraud).

Ms. Thagard was born in Lynwood, California and graduated cum laude from Menlo College where she served on the Board of Trustees for 9 years. She received her J.D. from the University of Southern California in 1980. While in law school she served as a judicial extern to the Honorable Robert Kingsly, Second Appellate District Court of Appeal. She is admitted to practice in both California (1980) and Nevada (2001) as well as the Federal Courts of both states. She also holds a California Real Estate Broker's License.

**MATTHEW W. GRIMSHAW** focuses his practice on insolvency law and litigation. He represents parties in all aspects of bankruptcy matters and out-of-court restructurings. He also has significant experience litigating and advising clients on issues resulting from the debtor-creditor relationship, including the enforcement of notes and guarantees, writs of attachment, receiverships, wrongful foreclosures, mortgage elimination scams, and injunctions.

Mr. Grimshaw was born in Mesa, Arizona. He graduated from Brigham Young University with a Bachelor of Arts degree in Economics. He graduated with honors from Willamette University College of Law, where he served as the editor-in-chief of the school's Journal of International Law and Dispute Resolution. Mr. Grimshaw was admitted to practice law in California in 2000.

Mr. Grimshaw served a two-year term as a judicial law clerk to the Honorable John E. Ryan. During his first year, Mr. Grimshaw served as Judge Ryan's trial law clerk. During his second year, when Judge Ryan was the chief judge of the Bankruptcy Appellate Panel of the Ninth Circuit Court of Appeals, Mr. Grimshaw served as his appellate law clerk.

Mr. Grimshaw has been asked on many occasions to present lectures on various subjects, including bankruptcy, creditors' rights, and legal ethics. He has published numerous articles on bankruptcy-related topics. In 2006, he was also appointed by Ninth Circuit Court of Appeals to serve on the committee that evaluated candidates and made recommendations as to who should fill existing vacancies on the United States Bankruptcy Court for the Central District of California.

Mr. Grimshaw is a long-time member of the Board of Directors for the Orange County Bankruptcy Forum. He also served as Chair of the Commercial Law and Bankruptcy Section of the Orange County Bar Association.

Mr. Grimshaw enjoys spending time with his family, reading, and traveling. Mr. Grimshaw is conversant in Spanish. He is an Eagle Scout and continues to be actively involved with the Boy Scouts of America.

**JUDITH E. MARSHACK** is an Associate with Marshack Hays LLP. She was born in Inglewood, CA. Ms. Marshack graduated from the California State University, Long Beach in 1982 and from Western State University, College of Law in 1992, and was admitted to practice law in 1992.

**LAILA MASUD** focuses her practice in bankruptcy and business litigation, including lender liability and creditors' rights.

Ms. Masud graduated cum laude from the University of California, Irvine in 2012. She earned her law degree from Pepperdine University School of Law in 2016. She was admitted to practice law in California in 2016. Prior to joining Marshack Hays, Ms. Masud served as a judicial law clerk to the Honorable Thomas B. Donovan at the United States Bankruptcy Court for the Central District of California, Los Angeles Division.

During law school, as an extern for the Honorable Vincent P. Zurzolo at the United States Bankruptcy Court for the Central District of California, Los Angeles Division, she served on the Rules Committee where she conducted research and wrote on various issues of bankruptcy law, including local court forms, rules and procedures. She also served as a student leader and was nominated for The Parris Institute for Professional Formation Award for Excellence in Leadership and Excellence in Peacemaking. In 2020, Ms. Masud served as the youngest President of the OCBA's Commercial Law and Bankruptcy Section. Ms. Masud is also a member of the International Women's Insolvency & Restructuring Confederation and in August 2020 Ms. Masud was profiled in the Orange County Business Journal for Woman in Law. Ms. Masud is conversant in Spanish, Urdu and Hindi.

**TINHO MANG** is an attorney at Marshack Hays. He recently earned his Juris Doctorate from the University of Southern California, Gould School of Law, and prior to that, graduated *magna cum laude* from the University of California, Los Angeles. While at law school, Mr. Mang served as the Executive Senior Editor of the Southern California Review of Law and Social Justice. He also served two full-time summers and one part-time fall semester as an extern in the United States Bankruptcy Court for the Central District of California for the Honorable Scott C. Clarkson. During his externship in bankruptcy court, Mr. Mang developed a deep appreciation for the intricacies of bankruptcy practice, participating substantially in a wide variety of bankruptcy matters ranging from Chapter 11 confirmations, adversarial proceedings for lien avoidance, and a trial seeking to avoid a preferential or fraudulent transfer.

Mr. Mang was sworn in as a member of the California State Bar on November 27, 2018.

**BRADFORD BARNHARDT** is an associate attorney at Marshack Hays. Before joining the firm, he completed a two-year judicial law clerkship for the Honorable Sandra R. Klein at the U.S. Bankruptcy Court in Los Angeles. Brad graduated with honors and in the top 10% of his class from Emory University School of Law and served as a Notes & Comments Editor for the Emory Bankruptcy Developments Journal. He received a Bachelor of Arts, summa cum laude, in English and mathematics from the University of Missouri and was elected to Phi Beta Kappa during his junior year.

Mr. Barnhardt was sworn in as a member of the California State Bar on December 23, 2019.

**PARALEGALS AND TRUSTEE ADMINISTRATORS**

**PAMELA KRAUS**, Trustee Case Administrator and Paralegal 1990 to Present; Education: Coastline Community College, Costa Mesa (A.A. 2004); Legal Assistant Training Program, Coastline Community College, American Bar Association Certification (Completion 2004). Member: Orange County Paralegal Association; Orange County Bankruptcy Forum; National Association of Bankruptcy Trustees.

**CHANEL MENDOZA**, Experience: Ms. Mendoza is a seasoned litigation and bankruptcy Legal Assistant/Paralegal. She has more than twenty years of law related experience comprising of workers' compensation, personal injury, business litigation, employment law, and bankruptcy, all while working under the direct supervision of active members of the California State Bar. Ms. Mendoza has also worked fourteen of those years under the direction and supervision of Marshack Hays LLP's founding partner, D. Edward Hays. Ms. Mendoza has federal and state court experience, including extensive trial and appellate knowledge. Ms. Mendoza is a former Board Member of NALS and is a current member of the National Notary Association and Orange County Legal Secretaries Association, Inc.

**LAYLA BUCHANAN**, Experience: Ms. Buchanan is a Senior Paralegal with Marshack Hays LLP and has over twenty years of law related experience. Ms. Buchanan has worked extensively in civil, bankruptcy and family law, working under the direct supervision of active members of the California State Bar. Ms. Buchanan obtained her Paralegal Certificate from Coastline Community College's ABA accredited program. Member: Orange County Legal Secretaries Association, Orange County Paralegal Association, and a current member of the National Notary Association. Ms. Buchanan has extensive knowledge in all aspects of state and federal court litigation and bankruptcy practices.

**CYNTHIA BASTIDA**, Experience: Ms. Bastida has over twenty years of experience working as a Legal Assistant/Paralegal. She has her Paralegal Certificate (completion in 1991) and earned a Bachelor of Arts in Psychology from California State University Fullerton in 2004. She has a wide range of experience from civil litigation, bankruptcy, product liability, lemon law, real estate and corporate law as well as eminent domain. Her skills include: Legal research, trial preparation along with drafting numerous fee applications, petitions, proofs of claim, notices, motions and discovery. Cynthia is a member of Orange County Legal Secretary Association (OCLSA).

**KATHLEEN FREDERICK**, Experience: Mrs. Frederick is a Junior Paralegal with Marshack Hays LLP. Mrs. Frederick graduated from the University of California, Los Angeles in 2008 with a bachelor's degree in English. She obtained her Paralegal Certificate from Coastline Community College's ABA accredited program in May of 2018. She has been working with the firm for more than five years and has over ten years legal experience. Mrs. Frederick is a member of the Orange County Paralegal Association and the National Association of Legal Assistants.

Billing Rates:

Partners	Rates	Associates	Rate	Paralegals	Rates
Richard A. Marshack	\$650	Judith E. Marshack	\$410	Pamela Kraus	\$280
D. Edward Hays	\$650	Laila Masud	\$390	Chanel Mendoza	\$260
Chad V. Haes	\$490	Tinho Mang	\$350	Layla Buchanan	\$260
David A. Wood	\$490	Bradford Barnhart	\$320	Cynthia Bastida	\$260
Of Counsel				Kathleen Frederick	\$200
Kristine A. Thagard	\$550				
Matthew W. Grimshaw	\$550				

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
870 Roosevelt, Irvine, CA 92620

A true and correct copy of the foregoing document entitled: **FIRST INTERIM APPLICATION FOR ALLOWANCE OF FEES AND COSTS FILED BY MARSHACK HAYS LLP AS GENERAL COUNSEL FOR TRUSTEE; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF TINHO MANG IN SUPPORT** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **April 14, 2022**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL:** On **April 14, 2022**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

### **DEBTOR**

NORTHERN HOLDING, LLC  
ATTN: OFFICER, A MANAGING OR GENERAL AGENT,  
OR TO ANY OTHER AGENT AUTHORIZED BY  
APPOINTMENT OR LAW TO RECEIVE SERVICE  
13217 JAMBOREE RD #429  
TUSTIN, CA 92782

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **April 14, 2022**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

PURSUANT TO COURTROOM POLICIES AND PROCEDURES OF HONORABLE ERITHE A. SMITH, COURTROOM 5A, § VIII. JUDGES' OR COURTESY COPIES, EXCEPT FOR DOCUMENTS 200 PAGES OR OVER, INCLUDING EXHIBITS, JUDGE SMITH **DOES NOT** REQUIRE JUDGES' COPIES.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 14, 2022

Date

Layla Buchanan

Printed Name

/s/ Layla Buchanan

Signature

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): CONTINUED:**

- **INTERESTED PARTY COURTESY NEF:** William H Brownstein Brownsteinlaw.bill@gmail.com
- **INTERESTED PARTY COURTESY NEF:** Steve Burnell sburnell@sulmeyerlaw.com, sburnell@ecf.courtdrive.com; sburnell@ecf.inforuptcy.com; mviramontes@sulmeyerlaw.com
- **ATTORNEY FOR INTERESTED PARTY LEE CODDING:** Robert P Goe kmurphy@goeforlaw.com, rgoe@goeforlaw.com; goeforecf@gmail.com
- **ATTORNEY FOR U.S. TRUSTEE (SA):** Nancy S Goldenberg nancy.goldenberg@usdoj.gov
- **ATTORNEY FOR CREDITOR FARM CREDIT WEST, FLCA:** Michael J Gomez mgomez@frandzel.com, dmoore@frandzel.com
- **ATTORNEY FOR TRUSTEE RICHARD A MARSHACK (TR):** D Edward Hays ehays@marshackhays.com, ehays@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.com
- **ATTORNEY FOR INTERESTED PARTY LEE CODDING:** Brandon J Iskander biskander@goeforlaw.com, kmurphy@goeforlaw.com
- **ATTORNEY FOR RESPONDENTS ERICH RUSSELL AND JOANNE RUSSELL:** Kari L Ley Ley1238@att.net
- **ATTORNEY FOR TRUSTEE RICHARD A MARSHACK (TR):** Tinho Mang tmang@marshackhays.com, tmang@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com; cmendoza@ecf.courtdrive.com
- **TRUSTEE RICHARD A MARSHACK (TR):** Richard A Marshack (TR) pkraus@marshackhays.com, rmarshack@iq7technology.com; ecf.alert+Marshack@titledxi.com
- **ATTORNEY FOR INTERESTED PARTY BANK DIRECT CAPITAL FINANCE:** Elissa Miller emiller@sulmeyerlaw.com, emillersk@ecf.inforuptcy.com; ccaldwell@sulmeyerlaw.com
- **ATTORNEY FOR DEBTOR NORTHERN HOLDING LLC:** Roksana D. Moradi-Brovia roksana@rhmfir.com, matt@rhmfir.com; janita@rhmfir.com; susie@rhmfir.com; max@rhmfir.com; priscilla@rhmfir.com; pardis@rhmfir.com; russ@rhmfir.com; rebecca@rhmfir.com; david@rhmfir.com; sloan@rhmfir.com
- **ATTORNEY FOR CREDITOR ADLER BELMONT GROUP, INC.:** Paul F Ready tamara@farmerandready.com
- **ATTORNEY FOR DEBTOR NORTHERN HOLDING LLC:** Matthew D. Resnik matt@rhmfir.com, roksana@rhmfir.com; janita@rhmfir.com; susie@rhmfir.com; max@rhmfir.com; priscilla@rhmfir.com; pardis@rhmfir.com; russ@rhmfir.com; rebecca@rhmfir.com; david@rhmfir.com; sloan@rhmfir.com
- **ATTORNEY FOR INTERESTED PARTY RIBOLI PASO ROBLES, LLC:** Victor A Sahn vsahn@sulmeyerlaw.com, pdillamar@sulmeyerlaw.com; pdillamar@ecf.inforuptcy.com; vsahn@ecf.inforuptcy.com; cblair@sulmeyerlaw.com; cblair@ecf.inforuptcy.com
- **ATTORNEY FOR TRUSTEE RICHARD A MARSHACK (TR):** Kristine A Thagard kthagard@marshackhays.com, kthagard@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com
- **UNITED STATES TRUSTEE (SA):** United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov
- **ATTORNEY FOR CREDITOR FARM CREDIT WEST, FLCA:** Reed S Waddell rwaddell@frandzel.com, sking@frandzel.com
- **ATTORNEY FOR CREDITOR FARM CREDIT WEST, FLCA:** Gerrick Warrington gwarrington@frandzel.com, sking@frandzel.com
- **INTERESTED PARTY COURTESY NEF:** David Wood dwood@marshackhays.com, dwood@ecf.courtdrive.com; lbuchananmh@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com